

**SECOND FIVE-YEAR REVIEW REPORT FOR
WASTE DISPOSAL, INC. SUPERFUND SITE
LOS ANGELES COUNTY, CALIFORNIA**



PREPARED BY

Army Corps of Engineers Seattle District

Approved by:

Angeles Herrera, Assistant Director
Federal Facilities & Site Cleanup Branch
Superfund Division
U.S. Environmental Protection Agency, Region 9

9/9/14

Date:

[This page is intentionally left blank.]

Executive Summary

This is the second Five-Year Review (FYR) of the Waste Disposal, Inc. (WDI) site, located in Santa Fe Springs, California. The purpose of this FYR is to review information to determine if the remedy is, and will continue to be, protective of human health and the environment. The triggering action for this FYR was the signing of the previous FYR on September 4, 2009.

The site covers 38 acres in an industrial and residential area of Santa Fe Springs. Several tenants and businesses occupy portions of the site, and a 42 million gallon concrete lined reservoir, capped by a Resource Conservation Recovery Act (RCRA)-equivalent engineered capping system, occupies most of the site. Contaminants in the soil include 11 metals, 7 chlorinated pesticides, 16 volatile organic compounds (VOCs), polyaromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs).

The original ROD was signed December 27, 1993 following remedial investigations, a feasibility study, and a proposed plan with public comment period. Based on information that became available after signature of the original ROD, EPA determined that further site investigation, supplemental feasibility study, and an Amended ROD would be necessary. The June 2002 Amended ROD modifies and supersedes the original selected remedy. The Amended ROD addresses a final sitewide remedy that includes the following components, which are designed to prevent exposure to the contaminated soil, buried wastes, soil gases, and site liquids, in order to protect long-term human health and the environment:

- Installation of a RCRA-equivalent cap for hazardous waste (RCRA Subtitle C) over the existing reservoir.
- Installation of engineered capping systems for areas outside the reservoir that will be designed to achieve RCRA solid waste engineering and performance standards (RCRA Subtitle D), including a hydraulic conductivity of 10^{-6} centimeters per second, and graded mono-fill covers, asphalt, concrete paving, and/or building foundations. Engineered capping systems will be installed over selected portions of the site.
- Installation of a gas collection, extraction, and treatment system beneath the RCRA-equivalent cap over the reservoir area to collect, remove, and treat subsurface gasses.
- Installation of liquids collection systems including liquids collection points (LCPs) in the reservoir, to monitor, collect, and extract leachate and free liquids for treatment and disposal at an off-site facility approved by EPA.
- Use of engineering controls (e.g. physical barriers and/or indoor venting systems) at, and/or within, existing and new buildings overlying or adjacent to waste to prevent exposure to site contaminants. Existing buildings or structures in locations where it is not technically feasible to install engineering controls will be demolished and removed.
- To minimize the potential exposure to soil gas, passive gas migration control (e.g. bio-venting wells) or active soil vapor extraction systems will be installed along portions of the waste

perimeter outside of the reservoir area and near existing buildings. Monitoring systems will be installed to determine performance.

- Implementation of institutional controls (ICs), including zoning ordinances, access controls, groundwater use restrictions, and restrictive covenants, to ensure the integrity of remedial systems, minimize the potential for exposure to residual wastes and hazardous substances, and to restrict land use and site access.
- Implementation of long-term groundwater monitoring to ensure that the revised remedy is not contributing to exceedances of groundwater standards.
- Implementation of long-term operations and maintenance (O&M) to ensure that all environmental systems and control components are functioning effectively.

All components of the remedy are functioning as designed and maintain protectiveness. No issues with operation and maintenance or Institutional Controls have been identified. Original exposure assumptions and Remedial Action Objectives remain valid. No new information has come to light that could call remedy protectiveness into question.

The remedy is protective of human health and the environment. The remedy successfully contains on-site waste, blocks exposure pathways, and prevents direct exposure to contaminated soils. The reservoir gas collection system and engineering controls for on-site structures prevent migration of vapors to on-site indoor air and/or off-site. Groundwater remains unaffected by site contamination.

Five-Year Review Summary Form

SITE IDENTIFICATION		
Site Name: Waste Disposal, Inc.		
EPA ID: CAD980884357		
Region: 9	State: CA	City/County: Santa Fe Springs/Los Angeles
SITE STATUS		
NPL Status: Final		
Multiple OUs? No	Has the site achieved construction completion? Yes	
REVIEW STATUS		
Lead agency: EPA If “Other Federal Agency” was selected above, enter Agency name: Click here to enter text.		
Author name (Federal or State Project Manager): Russell Mechem		
Author affiliation: EPA Region 9 Remedial Project Manager		
Review period: 01 October 2013 – 01 September 2014		
Date of site inspection: 23 January 2014		
Type of review: Statutory		
Review number: 2		
Triggering action date: September 4, 2009		
Due date (five years after triggering action date): September 4, 2014		

Five-Year Review Summary Form (continued)

Issues/Recommendations
OU(s) without Issues/Recommendations Identified in the Five-Year Review:
The WDI OU has no issues or recommendations.

Sitewide Protectiveness Statement	
<i>Protectiveness Determination:</i> Protective	<i>Addendum Due Date (if applicable):</i> Click here to enter date.
<i>Protectiveness Statement:</i> The remedy is protective of human health and the environment. The remedy successfully contains on-site waste, blocks exposure pathways, and prevents direct exposure to contaminated soils. The reservoir gas collection system and engineering controls for on-site structures prevent migration of vapors to on-site indoor air and/or off-site. Groundwater remains unaffected by site contamination.	

Contents

Executive Summary	i
List of Figures.....	vi
List of Tables	vi
List of Abbreviations.....	viii
1. Introduction	1
2. Site Chronology.....	2
3. Background	3
3.1. Physical Characteristics	3
3.2. Hydrology.....	6
3.3. Land and Resource Use.....	6
3.4. History of Contamination	7
3.5. Initial Response.....	7
3.6. Basis for Taking Action.....	8
4. Remedial Actions	8
4.1. Remedy Selection	8
4.2. Remedy Implementation.....	11
4.3. Operation and Maintenance (O&M).....	16
5. Progress Since the Last Five-Year Review.....	16
5.1. Previous Five-Year Review Protectiveness Statement and Issues	16
5.2. Work Completed at the Site During this Five-Year Review Period	17
6. Five-Year Review Process	17
6.1. Administrative Components.....	17
6.2. Community Involvement.....	17
6.3. Document Review	18
6.4. Data Review	25
6.5. Site Inspection.....	33
6.6. Interviews	34
6.7. Institutional Controls.....	34
7. Technical Assessment.....	35
7.1. Question A: Is the remedy functioning as intended by the decision documents? ...	35

7.2.	Question B: Are the exposure assumptions, Toxicity Data, Cleanup Levels, and Remedial Action Objectives (RAOs) Used at the Time of Remedy Selection Still Valid?	36
7.3.	Question C: Has Any Other Information Come to Light That Could Call Into Question the Protectiveness of the Remedy?	37
7.4.	Technical Assessment Summary	37
8.	Issues	37
9.	Recommendations and Follow-up Actions	37
10.	Protectiveness Statement	38
11.	Next Review.....	38
Appendix A:	List of Documents Reviewed.....	39
Appendix B:	Press Notices	43
Appendix C:	Interview Forms.....	47
Appendix D:	Site Inspection Checklist.....	51
Appendix E:	Photographs from Site Inspection Visit.....	65
Appendix F:	Institutional Control Technical Memorandum	75

List of Figures

Figure 1.	Location Map for the Waste Disposal Inc. Superfund site.....	4
Figure 2.	Site Features and Area Boundaries	5
Figure 3.	Major Remedy Components.....	15
Figure 4.	Location of Monitoring Systems	26

List of Tables

Table 1.	Chronology of Site Events	2
Table 2.	Soil Gas Performance Standards (ppbv ¹)	10
Table 3.	Indoor Air Threshold Levels ⁽¹⁾	12
Table 4.	Groundwater Maximum Contaminant Levels	14
Table 5.	Applicable or Relevant and Appropriate Requirements Evaluation	18
Table 6.	Summary of Potential Risks	22
Table 7.	Comparison of Ambient Air PRG (Amended ROD) to Current Industrial Air RSL (2014).....	24
Table 8.	Comparison of Toxicity Factors Used in the Risk Assessment (1989) Compared to Current Toxicity Factors (2013).....	24

Table 9. In-Business Air Monitoring (IBM) for MY12 (October 2011 to December 2012)	
Sampling Event Detectable Results of COCs.....	29
Table 10. Soil Vapor Probe (SVP) Monitoring for MY12 (October 2011 to December 2012)	
Sampling Event Detectable Results of COCs.....	31

List of Abbreviations

ARARs	Applicable or Relevant and Appropriate Requirements
bgs	below ground surface
CD	Consent Decree
CERCLA	Comprehensive Environmental Response Compensation and Liability Act
CFR	Code of Federal Regulations
COC	Contaminant of Concern
DTSC	Department of Toxic Substances Control
EPA	Environmental Protection Agency
ERC	Environmental Restriction Covenant
GW	Groundwater
IATL	Indoor Air Threshold Limit
ICs	Institutional Controls
ICMEWP	Institutional Control Monitoring & Enforcement Work Plan
MCL	Maximum Contaminant Level
NPL	National Priorities List
O&M	Operation and Maintenance
OM&M	Operation, Maintenance, and Monitoring
OU	Operable Unit
PAHs	polyaromatic hydrocarbons
PCBs	polychlorinated biphenyls
PCE	tetrachloroethene
PC	Project Coordinator
PCOR	Preliminary Closeout Report
PEL	Permissible Exposure Limit
PM	Project Manager
POC	Point of Compliance
ppbv	parts per billion by volume
PRP	Potentially Responsible Party
PRG	Preliminary Remediation Goal
RD	Remedial Design
RI/FS	Remedial Investigation/Feasibility Study
RA	Remedial Action
RAO	Remedial Action Objective
RCRA	Resource Conservation & Recovery Act
ROD	Record of Decision
RPM	Remedial Project Manager
RSL	EPA Region 9 Regional Screening Levels
SGPS	Soil Gas Performance Standards
TCE	Trichloroethene
UAO	Unilateral Administrative Order
USACE	U.S. Army Corps of Engineers
VOC	Volatile Organic Compound
VW	Vapor Well
WDI	Waste Disposal, Inc.
WDIG	Waste Disposal, Inc., Group

Second Five-Year Review Report

for

Waste Disposal, Inc. Superfund Site

1. Introduction

The purpose of a Five-Year Review (FYR) is to evaluate the implementation and performance of a remedy in order to determine if the remedy will continue to be protective of human health and the environment. The methods, findings, and conclusions of FYRs are documented in five-year review reports. In addition, FYR reports identify issues found during the review, if any, and document recommendations to address them.

The U.S. Environmental Protection Agency (EPA) prepares FYRs pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Section 121, 42 United States Code (USC) §9621. Section 121 states:

If the President selects a remedial action that results in any hazardous substances, pollutants, or contaminants remaining at the site, the President shall review such remedial action no less often than each five years after the initiation of such remedial action to assure that human health and the environment are being protected by the remedial action being implemented. In addition, if upon such review it is the judgment of the President that action is appropriate at such site in accordance with section [104] or [106], the President shall take or require such action. The President shall report to the Congress a list of facilities for which such review is required, the results of all such reviews, and any actions taken as a result of such reviews.

EPA interpreted this requirement further in the National Contingency Plan (NCP), 40 Code of Federal Regulations (CFR) §300.430(f)(4)(ii), which states:

If a remedial action is selected that results in hazardous substances, pollutants, or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure, the lead agency shall review such actions no less often than every five years after the initiation of the selected remedial action.

The U.S. Army Corps of Engineers (USACE), Seattle District, conducted the FYR and prepared this report regarding the remedy implemented at the WDI site in Santa Fe Springs, Los Angeles County, California. EPA is the lead agency for developing and implementing the remedy for the site.

This is the second FYR for the WDI site. The triggering action for this statutory review is completion of the previous FYR. The FYR is required because hazardous substances, pollutants, or contaminants remain at the site above levels that allow for unlimited use and unrestricted exposure.

The WDI Site is comprised of a single Operable Unit (OU), which addresses a final sitewide remedy. The remedy includes multiple components, designed to contain waste materials and prevent exposures to buried waste, contaminated soil and soil vapor. After extensive groundwater monitoring, however, EPA determined that the site has not contributed to significant exceedances of groundwater MCLs. The remedy includes long term operations and maintenance as well as long term performance and compliance monitoring. Although the remedy includes long-term groundwater monitoring, it does not include a groundwater restoration component. EPA will continue to evaluate groundwater through long term monitoring and Five Year Reviews.

2. Site Chronology

Table 1 lists the dates of important events for the Waste Disposal Inc. Superfund site.

Table 1. Chronology of Site Events

Event	Date
Reservoir used for crude oil storage	Pre 1924 – Late 1930s
Operation as a disposal site under permit with Los Angeles County	1949 – 1964
Most disposal activities ceased	1964
Proposed National Priorities List (NPL) listing	June 1986
NPL listing	July 1987
General notice issued to 28 Potentially Responsible Parties (PRPs)	1987
Initiation of Remedial Investigation/Feasibility Study (RI/FS) process	1988
Removal Action	1988
RI completed/FS commenced	1990
Further groundwater (GW) investigations	1992 – 2000
FS completed for contaminated soils and subsurface gases for Operable Unit #1 (OU1)	1993
Record of Decision (ROD) signed for OU1. EPA designated a second, reserved operable unit (OU2) for groundwater, with the groundwater remedy selection pending completion of groundwater study.	December 1993
Issued Unilateral Administrative Order (UAO) #94-17 to eight PRPs to compel commencement of Remedial Design (RD) activities for the site. This PRP group is known as the Waste Disposal, Inc., Group (WDIG).	1994
Pre-design Investigations	1994 – 1995
Pre-design Report	1995
90% Remedial Design Report, community meeting on 90% Design Report, public meetings revealed new information, decision to review the remedy selection and prepare an Amended ROD combining OU1 & OU2.	1996
EPA issued Amended UAO #97-09 to add 13 additional parties, and ordered additional investigative activities at the site as well as continued remedial design activities.	1997
Community meetings on Remedial Design	1999
Groundwater Data Evaluation Report	2000
Supplemental FS Report	2001

Event	Date
Remedial Design Investigations Summary Report	2001
Proposed Plan for revised remedy	June 2001
Amended ROD signed (one OU for entire site)	June 2002
Consent Decree filed	2003
Start of physical construction for the RA	March 2004
Remedy construction complete – Preliminary Closeout Report (PCOR)	August 2005
EPA approved the Final Remedial Action Completion Report. Operations, maintenance, and monitoring (OM&M) activities began	September 2006
Gas migration control system converted to passive mode	December 2007
First Five-Year Review	September 2009
VW-33 located using GPR	May 2010
VW-33 properly abandoned	October 2010
Sub-slab vapor probes installed in 5 parcels	December 2010
Revised OM&M Plan approved	June 2013

3. Background

3.1. *Physical Characteristics*

The WDI site encompasses approximately 38 acres in an industrial area on the east side of Santa Fe Springs in Los Angeles County, California. The site is bounded by Santa Fe Springs Road on the northwest, a warehouse and a private high school on the northeast, Los Nietos Road on the southwest, and Greenleaf Avenue on the southeast (Figure 1). Adjacent land uses include residential areas and additional businesses that undertake light industrial and commercial activities. The site has been divided into Areas 1 through 8 (Figure 2), which facilitated site assessment.

The site is generally level, with some mounding at the center of the site as a result of topographic contouring to facilitate cap construction and effective storm water management. Beneath the cap in the central portion of the site lies a buried, concrete-lined, 42-million gallon reservoir. The reservoir, 600 feet in diameter and 25 feet deep, was constructed before 1924. Initially, it was used for crude petroleum storage, and later to store a variety of liquid and solid wastes.

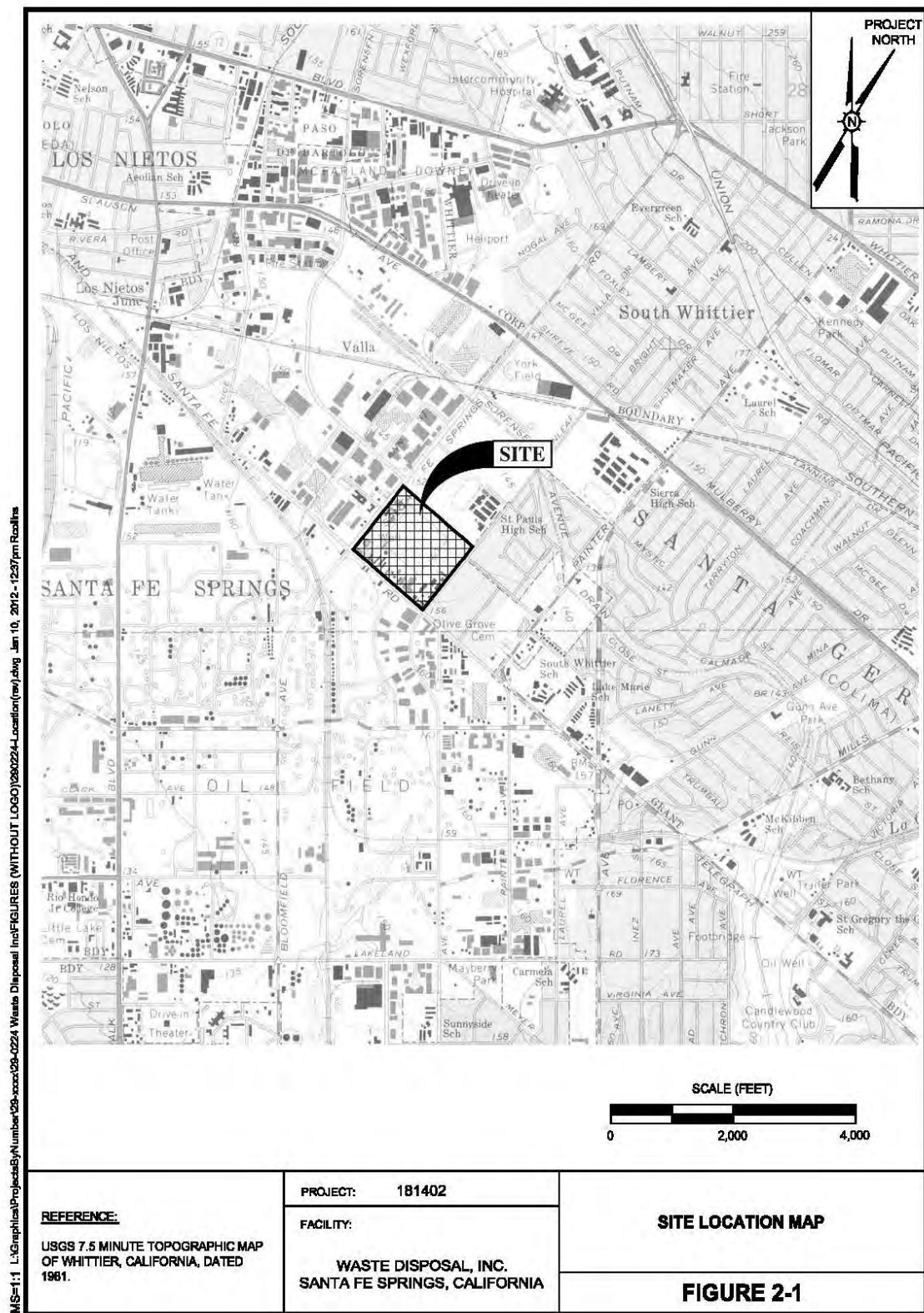


Figure 1. Location Map for the Waste Disposal Inc. Superfund site

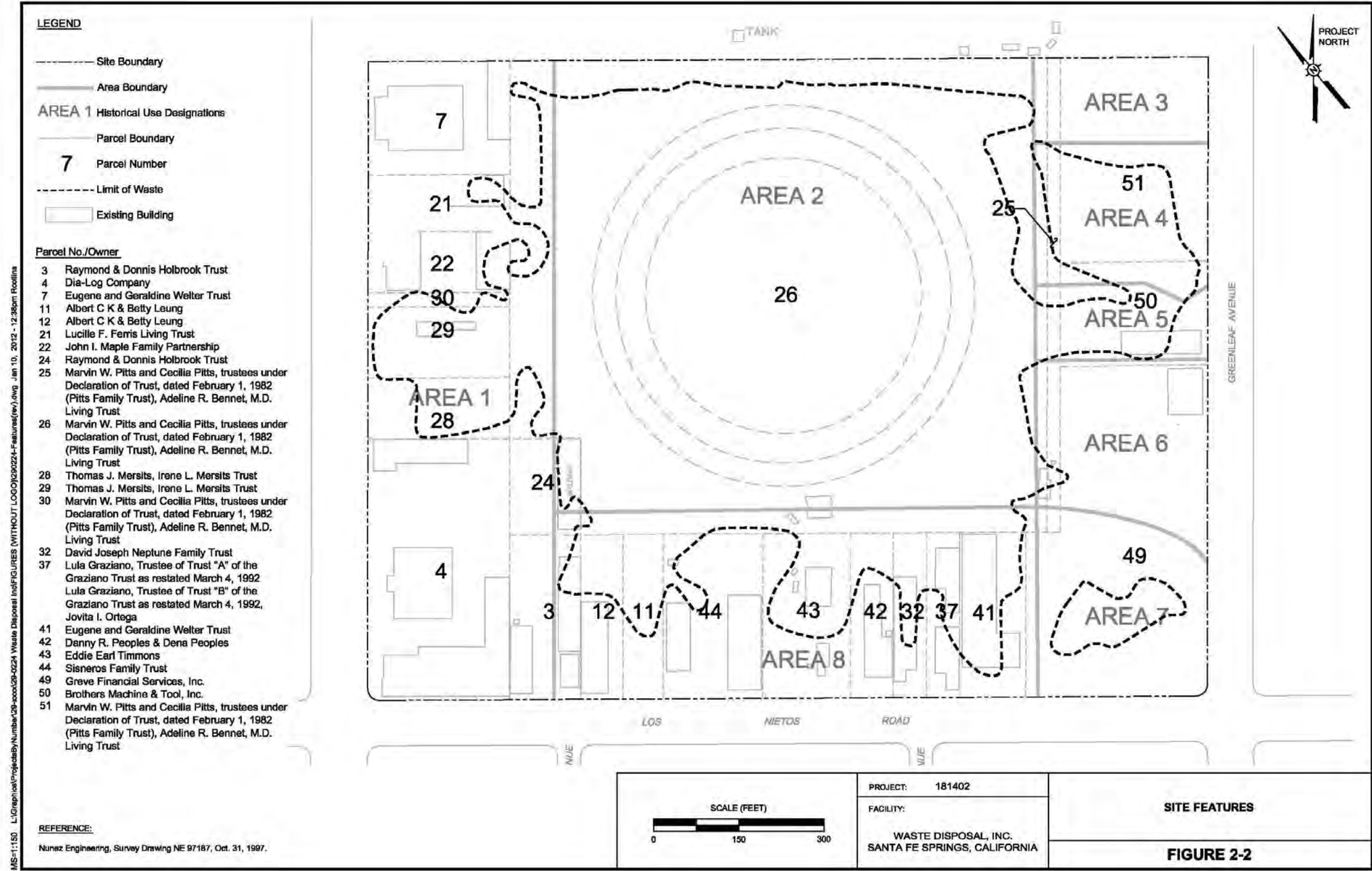


Figure 2. Site Features and Area Boundaries

3.2. Hydrology

The Groundwater Data Evaluation Report (USACE and CDM Federal, 2000) details the hydrogeology at the WDI site.

The site is located in the Whittier area of the Los Angeles Central Groundwater Basin. The site is underlain by unconsolidated recent alluvium and the Lakewood and San Pedro formations (primarily Pleistocene age fluvial sedimentary deposits). The subsurface stratigraphy and materials at the WDI site, listed in increasing depth, include:

- Five to 15 feet of fill material covering the concrete reservoir, waste containment areas, and most of the site.
- Ten to 25 feet of sandy clay and silt.
- Fifty feet of sandy, pebbly, channelized braided river (fluvial) deposits.
- At around 80 to 130 feet below ground surface (bgs), inter-bedded and pebbly sands.

The depth to groundwater varies across the site from approximately 48 to 65 feet bgs. The site is underlain by (1) a shallow, upper water-bearing zone that exhibits localized groundwater flow generally to the southwest, and (2) a deeper, lower water-bearing zone that represents the regional flow pattern toward the southeast. The shallow water-bearing zone at the site extends to a depth of approximately 70 feet. Regional data demonstrate the presence of deeper water-bearing zones extending from 70 feet to approximately 1,000 feet bgs. The upper and lower water-bearing zones exhibit some degree of hydraulic interconnection, and there does not appear to be a distinct physical separation between the two zones. Although local low hydraulic conductivity layers are present throughout the site, the deepest soil borings (100 to 130 bgs) at the site have not identified laterally extensive confining beds within the upper water-bearing zone. Groundwater flow rates have been estimated to range from 6 to 60 feet per year based on the on-site soil characteristics.

3.3. Land and Resource Use

Zoning for the site is M-2 Heavy Manufacturing with an industrial land use designation. The City of Santa Fe Springs supports commercial and industrial development in the area, and has supported redevelopment of the WDI site for industrial land uses. The City adopted a Specific Use Plan in May 2004 that lays out a vision for site redevelopment along with conceptual site plans, citing and set-back requirements, and design guidelines. The WDI site encompasses a total of 22 individual land parcels, 19 of which currently contain structures. Land owners and tenants operate a host of small business enterprises, encompassing commercial and light industrial activities. Existing structures accommodate a wide variety of light industrial businesses, including recreational vehicle storage, a tool and die shop, printing and plating shops, and vehicle maintenance facilities among others. The majority of small businesses use chemicals containing volatile organic compounds (VOCs), such as solvents and petroleum products that can contribute to detections by indoor air monitoring systems that were

installed as part of EPA's selected environmental remedy. No land uses near the site have changed since the remedial actions were selected for the site.

For many years, the City of Santa Fe Springs, some landowners, and other stakeholders have expressed strong interest in commercial redevelopment of the site. EPA, through the Superfund Redevelopment Initiative (SRI), has coordinated with stakeholders to encourage and support appropriate beneficial reuse that would not compromise the integrity of the completed remedy. The selected remedy and the City's Specific Use Plan anticipate the possibility that additional portions of the site might become available for beneficial reuse at some point in the future.

3.4. History of Contamination

The most significant feature of the WDI site is the buried 42-million gallon, concrete-lined reservoir (600 feet in diameter and 25 feet deep), located within Area 2 in the center of the site. The reservoir was constructed prior to 1924 and was initially used for crude petroleum storage. The areas outside of the reservoir began to be used for the unregulated disposal of a variety of liquid and solid wastes, as well as the possible storage and mixing of drilling mud, by the late 1920s. Sometime between 1937 and 1941, the owner/operators removed the reservoir cover anticipating a change of use. After removal of the reservoir cover, the reservoir was used as a landfill from the early to mid-1940s until the mid-1960s for the disposal of a variety of liquid and solid wastes.

The disposal site operated under a permit from Los Angeles County from 1949 until 1964, and may have operated for roughly two to three years afterwards while the site was graded. Permitted wastes included rotary drilling mud, clean earth, rock, sand, gravel, paving fragments, concrete, brick, plaster, steel mill slag, dry mud cake from oil field sumps, and acetylene sludge. Investigations have shown that disposed materials also included, but were not limited to, the following un-permitted wastes: organic wastes, oil refinery wastes, solvents, petroleum-related chemicals, and other chemical wastes. Wastes were disposed within the reservoir and in areas adjacent to and outside of the reservoir.

While disposal activities continued during the 1950s, the reservoir and some of the areas of the site outside the reservoir were gradually developed for commercial and industrial use. During this time, a number of structures were constructed onsite for small businesses. By 1963, the reservoir was covered with fill, and by 1964 most, although not all, disposal activities appear to have ceased. Grading over the remainder of the buried wastes continued until approximately 1966.

3.5. Initial Response

The site was placed on the NPL on July 22, 1987. Early in the remedial process, the EPA took immediate action to secure the site and limit access to potential sources of exposure. As part of a removal action program, the EPA erected a fence around the site in 1988 to prevent the potential for direct contact with site contaminants. The EPA placed multilingual signs at the site to inform the public of potential health risks.

3.6. *Basis for Taking Action*

At the time of NPL listing in July 1987, site conditions posed several human health risks, including the potential for uncontrolled exposure via direct contact with buried wastes and contaminated soil, and soil vapor migration into nearby businesses. At the time there were concerns that the site waste also created a potential threat of groundwater contamination. After extensive site investigations, however, current data indicate that the site has not contributed to exceedances of groundwater standards.

The contaminants of concern (COCs) in the soil include 11 metals, 7 chlorinated pesticides, 16 volatile organic compounds (VOCs), polyaromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs). The COCs identified for soil gas include benzene, ethylbenzene, toluene, xylene, carbon tetrachloride, chloroform, 1,2-dibromoethane, tetrachloroethene (PCE), 1,1,1-trichloroethane, trichloroethene (TCE), vinyl chloride, 1,2-dichloropropane, and methane. For groundwater, the chemicals identified for long-term detection monitoring include arsenic, lead, manganese, mercury, toluene, carbon tetrachloride, chloroform, PCE, TCE, benzene, toluene, xylene, carbon tetrachloride, chloroform, and vinyl chloride. The presence of these contaminants in the soil, soil gas, and groundwater provided the basis for taking action under CERCLA.

An Endangerment Assessment was performed by EPA in November 1989 to estimate the potential risk to current users of the site. The assessment concluded that the highest potential cancer risk was approximately 3×10^{-5} (or 3 in 100,000) which is within the cancer risk range considered acceptable by EPA. The non-carcinogenic Hazard Index (HI) for current uses was also below 1 and considered acceptable except for trespassers contacting surface soils with an HI equal to 3. For future land use scenarios, the assessment assumed a residential scenario that evaluated the risk to on-site residents of contacting contaminated surface soil and inhaling contaminants that migrate from subsurface gas to indoor air. The assessment concluded that the highest potential cancer risk was approximately 3×10^{-3} (or 3 in 1,000), which is outside the cancer risk range considered acceptable by EPA. The non-carcinogenic HI for future uses was greater than 1 and considered unacceptable for residents contacting soil. Because of the close proximity to residential areas and the potential for growth in the area the conservative residential assumption was the most reasonable one and served as a basis for taking action.

4. Remedial Actions

4.1. *Remedy Selection*

EPA completed an initial Remedial Investigation (RI) in November 1990 and commenced work on a Feasibility Study (FS). The RI/FS investigations consisted of ambient air monitoring, soil borings, installation and monitoring of groundwater wells, installation and monitoring of soil vapor wells, and geophysical surveys. During the investigation process, EPA conceptually identified eight sub-areas for discussion purposes, based on previous uses and conditions. These areas are shown on Figure 2. In January 1992, EPA undertook additional groundwater monitoring at WDI to assess the possibility that the site had contributed to exceedances of groundwater standards. Based on these investigations, EPA prepared a Proposed Plan and then finalized a ROD in 1993. The original remedy (1993 ROD)

consisted of building a hazardous waste cap, with capacity to add gas extraction and treatment if necessary.

Based on information that became available after the signature of the original ROD in 1993, EPA determined that an Amended ROD would be required to ensure protection of human health and the environment. The Amended ROD modified the previously selected remedy for the contaminated soils and addressed groundwater conditions at the WDI site. Information that led to the Amended ROD included: the expanded lateral extent and volume of buried waste on the site, new information on the nature and increased extent of soil gas beneath the site; and the presence of liquids inside the buried concrete-lined reservoir at the center of the site.

The Amended ROD selected the final remedy for the site and addressed waste materials, contaminated soil, subsurface liquids, subsurface gases, and groundwater conditions. The major components of the revised remedy are as follows:

- 1) Installation of RCRA-equivalent cap for hazardous waste over the existing reservoir;
- 2) Installation of engineered capping systems for areas outside of the reservoir that will be designed to achieve RCRA solid waste engineering and performance standards, including hydraulic conductivity of 10^{-6} centimeters per second, and graded soil mono-fill covers, asphalt, concrete paving, and/or building foundations;
- 3) Installation of a gas collection, extraction, and treatment system beneath the RCRA-equivalent cap over the reservoir to collect, remove, and treat subsurface gases;
- 4) Installation of liquids collection systems including liquids collection point in the reservoir, to monitor, collect, and extract leachate and free liquids for treatment and disposal at an off-site facility approved by EPA;
- 5) Use of engineering controls at, and/or within, existing and new building overlying or adjacent to waste to prevent exposure to site contaminants. Existing buildings or structures in locations where it is not technically feasible to install engineering controls will be demolished or removed;
- 6) To minimize the potential exposure to soil gas, passive gas migration control (e.g. bio-venting wells) or active soil vapor extraction systems will be installed along portions of the waste perimeter outside of the reservoir area and near existing buildings. Monitoring systems will be installed to ensure performance. Table 2 presents the Soil Gas Performance Standards (SGPS) determined in the ROD for COCs at the WDI site.
- 7) Implementation of institutional controls (ICs), including zoning ordinances, access controls, groundwater use restrictions, and restrictive covenants, to ensure the integrity of remedial systems, minimize the potential for exposure to residual wastes and hazardous substances, and to restrict land use and site access;
- 8) Implementation of long-term groundwater monitoring to ensure the revised remedy is not contributing to exceedances of groundwater standards; and
- 9) Implementation of long-term operations and maintenance (O&M) to ensure that all environmental systems and control components are functioning effectively.

Table 2. Soil Gas Performance Standards (ppbv¹)

Contaminant	Media	Soil Gas Performance Standard
1,2-Dichloroethane	Air	20
1,1-Dichloroethene	Air	100
1,2,4-Trimethylbenzene	Air	20
1,2-Dichloroethene (cis)	Air	180
1,2-Dichloroethene (trans)	Air	400
1,2-Dichloropropane	Air	20
1,3,5-Trimethylbenzene	Air	20
1,2-Dibromoethane	Air	1
1,1,1-Trichloroethane	Air	3,600
Carbon Tetrachloride	Air	21
Benzene	Air	10
Chloroform	Air	20
Ethylbenzene	Air	5,000
Methane	Air	1.25% (near buildings 5.0% (site perimeter))
Xylene	Air	4,000
Tetrachloroethene	Air	500
Toluene	Air	2,000
Trichloroethene	Air	200
Vinyl Chloride	Air	10

(1) ppbv — parts per billion by volume

Remedial Action Objectives (RAOs) are listed in the Amended ROD. The RAOs for the remedy as stated in the Amended ROD are as follows:

- Protect human health and the environment by preventing exposure to buried wastes and contaminated soils;
- Protect current and future on-site and off-site receptors from exposure to soil gases;
- Prevent human exposure, from direct contact, consumption, and other uses, to site liquids with contaminant concentrations exceeding state and federal standards;
- Prevent site liquids from contributing to exceedances of state and federal groundwater standards; and
- Prevent human exposure to groundwater that exceeds state and federal standards due to site-related contaminants.

The primary source of contamination at the WDI site is a landfill, including the reservoir in the central area and waste materials in the surrounding area. The selected remedy therefore incorporates a landfill-based approach, including: containment; collection and treatment of gases; collection and removal of site liquids; and institutional controls. In addition to monitoring of soil gas and indoor air, the remedy includes long-term groundwater monitoring to ensure protectiveness, to detect possible future changes in the groundwater conditions, and to determine if the site might cause exceedances of contaminant standards.

4.2. *Remedy Implementation*

Implementation of the remedy for the WDI site includes the components listed and described below. Refer to Figure 2, Figure 3, and Figure 4 for location of the components and Areas.

Construction of the listed components began in March 2004 and was complete in August 2005.

1. RCRA Subtitle C-Equivalent Cover: The cover was installed over the existing reservoir in Area 2. The cover consists of geosynthetic materials (geosynthetic clay liner, HDPE geomembrane, geocomposites, and geo-textiles) below a vegetative soil layer. No issues with the cover have been noted since implementation. As required by the OM&M plan, annual inspection has been conducted and documented on this cover by WDIG under oversight by a USACE Engineer.
2. Engineered Capping Systems: The capping systems were installed for areas outside the reservoir designed to achieve RCRA solid waste engineering and performance standards. This includes a RCRA Subtitle D-equivalent cover over the remainder of Area 2 and parts of other areas, as well as asphalt, concrete paving, and/or building foundations in selected portions of the following Areas: 1, 2, 4, 5, 6, 7, and 8. The capping systems have worked as designed with no issues since implementation. As required by the OM&M plan, annual inspection has been documented on this engineered capping system by PNI under oversight by a USACE Engineer. All necessary repairs/crack sealing on the concrete slabs have been performed and documented annually in the form of a memorandum letter sent to EPA.
3. Gas Collection, Extraction, and Treatment System: This system was installed beneath the RCRA Subtitle C-equivalent cover over the reservoir to collect, remove, and treat subsurface gases.
 - Radial Gas Collection System: Vapor is treated through activated carbon. The system consists of eight buried pipes below the finished sub-grade of the cap. The pipes extend radially from a manifold system constructed at the site high point and end within 25 feet of the edge of the reservoir. Although initially constructed with blowers for active collection, the system was converted to passive operation in December 2007, consistent with the work plan, due to very low rates of gas generation.
 - Long-Term Soil Gas Monitoring: The long-term program is intended to monitor selected soil vapor monitoring wells and the reservoir gas collection system to determine the potential for health risks associated with soil gas migration, and to ensure compliance with the Soil Gas Performance Standards (SGPS) established for the site. See Table 2 above.
4. Liquids Collection System: This system includes four liquids collection points (LCPs) in the reservoir to monitor, collect, and extract leachate and free liquids for treatment and disposal at an off-site facility approved by EPA. Two of the collection points (LC-2 and LC-4) were automated in December 2007, and are pumped continuously. Since the automatic recovery system was installed, approximately 5,155 gallons of liquids were collected at well LC-2 and approximately 3,240 gallons of liquids were collected at well LC-4 through September 2013. The volume of liquids recovered during this reporting period was approximately 670 gallons at LC-2 and approximately 420 gallons at LC-4. Since implementation, the LCPs have functioned as designed.

5. Engineering Controls: These controls include physical barriers and/or indoor venting systems at, and/or within, existing and new buildings overlying or adjacent to waste, in order to prevent indoor air exposure to site contaminants.

- **Passive Bio-venting Wells:** These wells were installed for soil gas migration control along portions of the waste perimeter outside of the reservoir area and near existing buildings. Twenty-four bio-vent wells were constructed at the site. The purpose of the bio-vent wells is to provide air for aerobic decomposition/biodegradation.
- **In-Business Long-Term Monitoring of Ambient Air:** The Waste Disposal, Inc. Group (WDIG) conducts this monitoring, alternately called “In Business Air Monitoring” in some documents, in onsite buildings. The objective of the in-building monitoring is to ensure that subsurface soil gas is not migrating from waste source areas to the surface and into tenant-occupied buildings. Concentrations measured in site buildings are compared with the Indoor Air Threshold Limits (IATLs) (Table 3) to determine if there are potential health risks to tenants and employees. Currently, approximately 10 monitoring locations are sampled per quarterly event.

Table 3. Indoor Air Threshold Levels⁽¹⁾

Contaminant	Indoor Air Threshold Level (ppbv) ⁽²⁾
1,1-Dichloroethene	53.0 ⁽³⁾
1,2-Dichloroethene (cis)	18.6
1,2-Dichloroethene (trans)	36.8
1,2-Dichloropropane	1.86
1,2-Dibromoethane	0.06
1,1,1-Trichloroethane	368
Carbon Tetrachloride	0.68
Benzene	2.0
Chloroform	3.4
Ethylbenzene	490
Methane	1.25%
Xylene	142.8
Tetrachloroethene	10.6
Toluene	212
Trichloroethene ⁽⁴⁾	3.0 µg/m ³
Vinyl Chloride	0.25

1 CDM Federal Programs Corporation, Sub-surface Gas Contingency Plan, Waste Disposal, Inc. Superfund Site, July 1997.

2 Indoor Air Threshold Levels are expressed in part per billion volume (ppbv), except for Trichloroethene (TCE) that is expressed in µg/m³

3 Developed separately by EPA subsequent to Sub-surface Gas Contingency Plan (See foot note 1)

4 Pursuant to EPA policy requirements, the indoor air interim threshold level for TCE has been revised to 3.0 µg/m³ for the in-business ambient air monitoring program.

- **In-Business Sub-Slab Vapor Sampling:** In December 2010, sub-slab vapor probes were installed in 5 parcels to verify soil vapor composition and for comparison to in-business air. Sub-slab soil vapor probe monitoring data provides an indication of whether VOCs have migrated from the soil into a building. Data is presented in Table 11. For example, if sub-slab soil vapor probe concentrations are equal to or less than the corresponding in-business air concentrations, it is reasonable to conclude that indoor air concentrations may originate from sources other than vapor intrusion, such as business activities at the location.

7. **Institutional Controls (ICs):** These controls, including zoning ordinances, access controls, groundwater use restrictions, and restrictive covenants, were implemented to ensure the integrity of remedial systems, minimize the potential for exposure to residual wastes and hazardous substances, and restrict land use and site access. In accordance with the Institutional Controls Monitoring and Enforcement Work Plan (ICMEWP), a monitoring system has been implemented. WDIG contracts with a firm that specializes in the management of IC monitoring programs for several other Superfund sites. The WDIG site Trust conducts quarterly IC monitoring and enforcement inspections.

8. **Groundwater Detection Monitoring:** The remedy includes this monitoring to ensure that the site is not contributing to exceedances of groundwater MCLs (Table 4). The groundwater program includes background wells, point-of-compliance wells, and wells suitable for early detection of release from a waste unit. No groundwater exceedances related to site contaminants have been detected since monitoring began. MCLs are not remedy performance standards. There are no performance standards in the Amended ROD for groundwater.

Table 4. Groundwater Maximum Contaminant Levels

Compound	MCLs at Time of Amended ROD⁴, 2002 (mg/L)
Arsenic	0.01
Lead	TT Action Level= 0.015 ¹
Manganese	0.05 ²
Mercury	0.002
Benzene	0.005
Toluene	1.0
Xylene	10.0
Carbon Tetrachloride	0.005
Chloroform	NA ³
Tetrachloroethene	0.005
Trichloroethene	0.005
Vinyl Chloride	0.002

(1) Lead and copper are regulated by a treatment technique that requires drinking water delivery systems to control the corrosiveness of their water. If, more than 10% of tap water samples have concentrations that exceed the action level, water systems must take additional steps. For lead, the action level is 0.015 mg/L.

(2) Secondary MCL

(3) There was not an MCL for chloroform

(4) MCLs are not remedy performance standards. There are no performance standards in the Amended ROD for groundwater.

9. Long-Term Operation & Maintenance (O&M): Long term O&M and performance monitoring were implemented to ensure that all environmental systems and IC components are functioning effectively. O&M activities commenced in September 2006, are ongoing, and have encountered no significant issues since implementation.

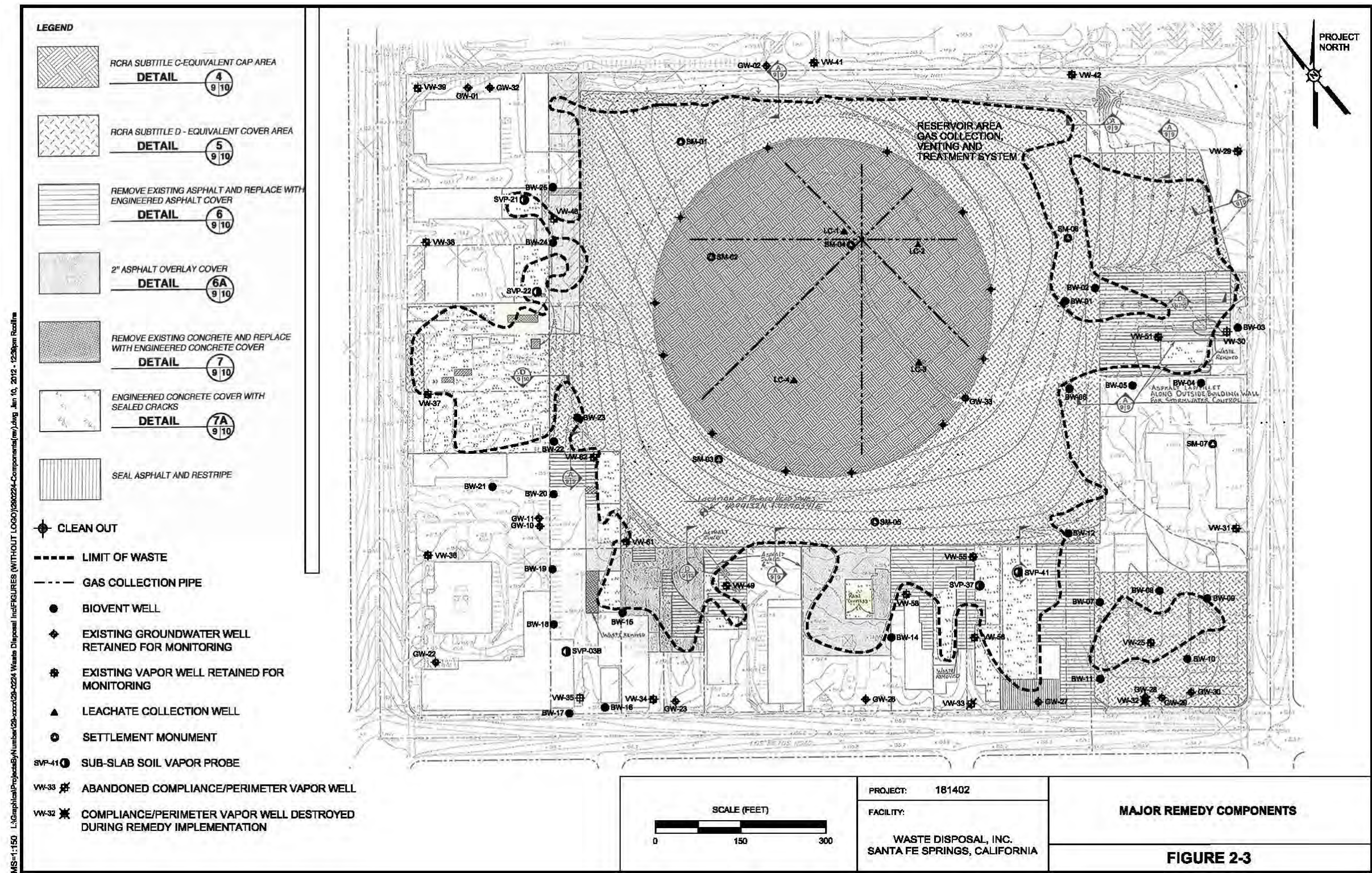


Figure 3. Major Remedy Components

4.3. Operation and Maintenance (O&M)

The Operation and Maintenance (O&M) activities, performed for the site remedial systems and described in detail in the Operations, Maintenance and Monitoring (OM&M) Plan are summarized below.

- Inspection of the RCRA Subtitle C-equivalent and Subtitle D-equivalent covers
- Reservoir gas collection, venting and treatment system operation, inspection, and carbon change outs
- Groundwater and soil vapor monitoring well inspections
- Groundwater and soil vapor sampling
- In-business Air Monitoring (ambient air and sub-slab vapor sampling)
- Bio-vent well inspections
- Storm water drainage system inspections
- Monitoring of liquid levels and liquid removal
- Landscape maintenance
- Site security
- Reporting

There have been no significant issues with O&M activities since implementation in September 2006. Average annual O&M costs for the site are approximately \$500,000 per year, as reported by WDIG. The locations of major remedy components listed above are shown in Figure 3.

5. Progress Since the Last Five-Year Review

5.1. Previous Five-Year Review Protectiveness Statement and Issues

The protectiveness statement from the 2009 FYR for the WDI site stated the following:

The remedy is protective of human health and the environment. The remedy successfully contains on-site waste and blocks exposure pathways. The cap prevents direct exposure to contaminated soils. The soil gas migration control systems prevent migration of vapors to indoor air and/or off-site. Groundwater remains unaffected by site contamination.

The 2009 FYR did not list any issues or recommendations.

5.2. *Work Completed at the Site During this Five-Year Review Period*

The following has been completed since the last five year review:

- In May 2010, vapor well VW-33, which was covered during construction activities, was located using Ground-Penetrating Radar (GPR).
- In October 2010, well VW-33 was properly abandoned.
- In December 2010, sub-slab Soil Vapor Probes (SVP) were installed at 5 of the 10 in-business air monitoring (IBM) locations to verify soil vapor composition and for comparison to IBM results.
- Ongoing coordination between EPA and WDIG to explore opportunities for optimization of the monitoring program.

6. Five-Year Review Process

6.1. *Administrative Components*

EPA Region 9 initiated the FYR in October 2013 and scheduled its completion for September 2014. The EPA review team was led by Russell Mechem of EPA, Remedial Project Manager (RPM) for the Waste Disposal, Inc. site. David Sullivan (geologist) and Karah Haskins (physical scientist) with the Seattle District USACE supported EPA with writing the FYR. In August 2013, EPA held a scoping call with the review team to discuss the site and items of interest as they related to the protectiveness of the remedy currently in place. A review schedule was established that consisted of the following:

- Community notification;
- Document review;
- Data collection and review;
- Site inspection;
- Local interviews; and
- Five-Year Review Report development and review.

6.2. *Community Involvement*

EPA published a public notice in the Whittier Daily News on February 26th, 2014. This notice announced the beginning of the FYR for the Waste Disposal, Inc. site, and described the purpose and process for the review. In addition, the notice invited the community to participate in interviews and provided contact information for EPA staff. EPA did not receive any contacts in response to this public notice.

In terms of ongoing community involvement over the past five years, EPA has twice received phone calls from an individual living across the site informing EPA that there was water dripping onto the sanitary sewer system from the site. These reports were immediately investigated, and it was found that the leak was from an irrigation system used to water grass with clean water from the site. On both occasions, the irrigation system was repaired immediately and the resident was called back to describe the action taken.

EPA has also received a number of inquiries from potential developers concerning their potential interest in redeveloping portions of the site for commercial purposes. EPA continues to work with stakeholders,

including the city, landowners, regulators, and potential developers, to evaluate options and support appropriate beneficial reuse that would not adversely impact the completed remedy.

The Five-Year Review report will be made available to the public once it has been finalized. Copies of this document will be placed in the designated public repository: Santa Fe Springs City Library, 11700 East Telegraph Road, Santa Fe Springs, CA 90670 and at the Superfund Records Center in San Francisco. Upon completion of the FYR, a public notice will be placed in the Whittier Daily News to announce the availability of the final report at the repository.

6.3. Document Review

This FYR included a review of relevant, site-related documents including the ROD, remedial action reports, and recent monitoring data. A complete list of the documents reviewed can be found in Appendix A.

ARARs Review

Section 121(d)(2)(A) of CERCLA specifies that Superfund remedial actions must meet any federal standards, requirements, criteria, or limitations that are determined to be legally applicable or relevant and appropriate requirements (ARARs). ARARs are those standards, criteria, or limitations promulgated under federal or state law that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a CERCLA site.

Federal and state laws and regulations that have been promulgated or changed over the past five years are described in Table 5. The table does not include those ARARs identified in the Amended ROD that are no longer pertinent, now that the response action has transitioned from construction to long-term OM&M phase work. For example, ARARs that related to remedial design and construction are not included in the table if they do not continue into long-term OM&M. There have been no revisions to laws and regulations that affect the protectiveness of the remedy.

Table 5. Applicable or Relevant and Appropriate Requirements Evaluation

Requirement	Citation	Document	Changes to ARAR (Effect on Protectiveness)
Chemical-Specific, Water Quality			
Clean Water Act, 33 USC §1251-1387, and 40 CFR pt. 122, National Pollution Discharge Elimination System, implemented by State Water Resources Control Board Statewide General Permits re Storm water Discharges	9908 (General Construction) and 97-03 (General Industrial)	Amended ROD	No changes have been made that affect protectiveness.
Location-Specific			
Post-closure Land Use	27 CCR §21190	Amended ROD	No changes have been made that affect protectiveness

Requirement	Citation	Document	Changes to ARAR (Effect on Protectiveness)
Action-Specific			
Seismic Design Standards	22 CCR §66264.25(b)	Amended ROD	No changes have been made that affect protectiveness
Closure and Post-closure Care	22 CCR §66264.310	Amended ROD	No changes have been made that affect protectiveness.
Precipitation and Drainage Controls	23 CCR §2546	Amended ROD	No changes have been made that affect protectiveness
Allowance for Engineered Alternatives to Construction or Prescriptive Standards	27 CCR §20080(b)(c)	Amended ROD	No changes have been made that affect protectiveness
General Criteria for Waste Management Units and Containment Structures	27 CCR §§ 20310(d), 20320, 20360	Amended ROD	No changes have been made that affect protectiveness
Leachate Collection & Removal	27 CCR §20340	Amended ROD	No changes have been made that affect protectiveness
Precipitation and Drainage Controls	27 CCR §20365	Amended ROD	No changes have been made that affect protectiveness
Vadose Zone Monitoring	27 CCR §20415(d)	Amended ROD	No changes have been made that affect protectiveness
Grading of Fill surface at Landfill and Disposal Sites	27 CCR §20650	Amended ROD	No changes have been made that affect protectiveness
Dust Control for Landfill and Disposal Sites	27 CCR §20800	Amended ROD	No changes have been made that affect protectiveness
Gas Control	27 CCR §20919	Amended ROD	No changes have been made that affect protectiveness
Gas Monitoring and Control during Closure and Post-closure	27 CCR §20921	Amended ROD	No changes have been made that affect protectiveness
Monitoring during Closure and Post-closure	27 CCR §20923	Amended ROD	No changes have been made that affect protectiveness
Perimeter Monitoring during Closure and Post-closure	27 CCR §20925	Amended ROD	No changes have been made that affect protectiveness
Structure Monitoring during Closure and Post-closure	27 CCR §20931	Amended ROD	No changes have been made that affect protectiveness
Monitoring Parameters during Closure and Post-closure	27 CCR §20932	Amended ROD	No changes have been made that affect protectiveness

Requirement	Citation	Document	Changes to ARAR (Effect on Protectiveness)
Monitoring Frequency during Closure and Post-closure	27 CCR §20933	Amended ROD	No changes have been made that affect protectiveness
Landfill Gas Control	27 CCR §20937	Amended ROD	No changes have been made that affect protectiveness
Closure and Post-closure Maintenance Requirements for Disposal Sites and Landfills	27 CCR §21090	Amended ROD	No changes have been made that affect protectiveness
Security at Closed Sites	27 CCR §21135	Amended ROD	No changes have been made that affect protectiveness
Final Cover Standards	27 CCR §21140	Amended ROD	No changes have been made that affect protectiveness
Final Grade	27 CCR §21142	Amended ROD	No changes have been made that affect protectiveness
Slope Stability (Final Site Grade)	27 CCR §21145	Amended ROD	No changes have been made that affect protectiveness
Drainage and Erosion Control	27 CCR §21150	Amended ROD	No changes have been made that affect protectiveness
Landfill Gas Control and Leachate Contact Prevention	27 CCR §21160	Amended ROD	No changes have been made that affect protectiveness
Post-closure Care and Use of Property	27 CCR §21180	Amended ROD	No changes have been made that affect protectiveness
Water Quality Monitoring Requirements for Permitted Facilities	22 CCR §§66264.95, 66264.97, 66264.98, 66264.99	Amended ROD	No changes have been made that affect protectiveness
Groundwater Monitoring	27 CCR §§20405, 20415-20430	Amended ROD	No changes have been made that affect protectiveness
Porter-Cologne Water Quality Control Act	Cal. Water Code §§13000, 13140, 13240; State Water Resources Control Board Resolution No. 88-63, "Sources of Drinking Water Policy"; Los Angeles RWQCB Resolution 89-03 (adopting Resolution 8863 into Basin Plan)	Amended ROD	No changes have been made that affect protectiveness

Human Health Risk Assessment Review

The human health risk assessment method and results for the WDI site are detailed in the Endangerment Assessment (Ebasco, 1989) and updated in the Amended ROD (EPA, 2002).

The Final Endangerment Assessment of November 1989 identified three possible exposure pathways and one potential future exposure pathway. The current exposure pathways considered in the Endangerment Assessment were:

- Direct contact with contaminated surface soils;
- Inhalation of airborne particles by students and nearby residents; and
- Inhalation of volatiles by students and nearby residents.

The future risk pathway evaluated in the Endangerment Assessment was:

- Direct contact with contaminated surface soils by future hypothetical residents with homes built on top of the site.

The Endangerment Assessment concluded that under the current land use scenario, the highest potential cancer risk (plausible maximum) is approximately 3×10^{-5} or (3 in 100,000) which is within the cancer risk range considered acceptable by EPA (Table 6). The non-carcinogenic Hazard Indices (HI) for current uses were also below 1 and considered acceptable except for trespassers contacting surface soils with an HI equal to 3.

For future land use scenarios the assessment concluded that the highest potential cancer risk is approximately 3×10^{-3} (or 3 in 1,000), which is outside the cancer risk range considered acceptable by EPA (Table 6). The non-carcinogenic HI for future uses was greater than 1 and considered unacceptable for residents contacting soil and residents ingesting contaminated groundwater from off-site sources.

Table 6. Summary of Potential Risks

Exposure Scenario	Total Lifetime Cancer Risks		Non-Carcinogenic Hazard Index (CDI/RfD)	
	Average	Plausible Maximum	Average	Plausible Maximum
Current Land Use				
Trespassers contacting surface soils	0.0000005	0.00003	0.05	3.0
Offsite Residents inhaling airborne particulates				
• 0.1 km downwind of site	0.000003	0.000008	0.002	0.002
• 0.5 km downwind of site	0.0000005	0.000002	0.0003	0.0003
• 1.0 km downwind of site	0.0000002	0.0000008	0.0002	0.0002
Students inhaling airborne particulates	0.0000002	0.0000004	0.0004	0.0005
Offsite Residents inhaling airborne volatile chemicals				
• 0.1 km downwind of site	0.0000003	0.000005	0.000002	0.000009
• 0.5 km downwind of site	0.00000005	0.000001	0.0000004	0.000002
• 1.0 km downwind of site	0.00000002	0.0000005	0.0000002	0.0000009
Students inhaling airborne volatile chemicals	0.00000003	0.0000003	0.0000004	0.000003
Future Land Use				
Onsite Residents contacting soil				
• Adults	0.000003	0.0007	0.2	10
• Children	0.00002	0.003	2.0	500
Onsite Residents ingesting groundwater				
• Adults	0.00004	0.0003	.5	2.0
• Children	NA		2.0	8.0
Onsite Residents inhaling volatile chemicals in indoor air				
• Adults	0.00006	0.0006	0.0005	0.001
• Children	NA		0.0009	0.003

Values shown in bold type exceed EPA's 1×10^{-4} risk level or a Hazard Index of 1 using future land use scenario only.

The 2002 Amended ROD added a new possible exposure pathway: inhalation of subsurface soil gas constituents migrating from the waste pits through structure foundations. The Amended ROD also evaluated the potential for migration of contaminants from the waste pit to groundwater and determined that this was not a likely exposure potential.

No significant changes to risk assessment methodology or in the risk assessment results since 2002 indicate a change in the level of protectiveness. The exposure parameters used to develop the corrective action objectives are standard default EPA values. The exposure assumptions are for a future residential receptor, and are therefore conservative, valid, and appropriate.

Vapor Intrusion:. EPA’s understanding of contaminant migration from soil gas and/or groundwater into buildings has evolved over the past few years leading to the conclusion that vapor intrusion may have a greater potential for posing risk to human health than assumed when the Amended ROD was prepared. In September 2002, EPA released an external review draft version of its vapor intrusion guidance titled “Evaluating the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils” (EPA 2002).

The potential for vapor intrusion is evaluated following a “multiple lines of evidence” approach. The contaminants of concern for vapor intrusion include VOCs and methane. The soil gas extraction and treatment system and engineering controls for structures prevent migration of vapors to indoor air and/or off-site. A series of in-business and ambient air monitoring events in the past has shown few exceedances of Indoor Air Threshold Levels (IATLs), and the observed exceedances were attributable to the tenants and operations conducted at the occupied buildings. The results of soil vapor monitoring are presented in the Data Review section (6.4). The data analysis confirms that the groundwater is not affected by contaminants that remain on site. Thus off-gassing from groundwater would not be a contributing factor for vapor intrusion. During inspections of the landfill RCRA-compliant cover any cracks found in foundations of the buildings are sealed and previously sealed cracks are inspected to ensure there is not a pathway for vapor intrusion.

Toxicity values: EPA’s Integrated Risk Information System (IRIS) is a program that is used to determine whether there have been updates to toxicity values used by the Agency in risk assessment based on newer scientific information that has become available. In the past five years, there have been a number of changes to the toxicity values for certain contaminants of concern (COCs) at the site.

Several toxicity factors have changed since the original 1989 risk assessment (Ebasco, 1989). The original assessment concluded that the contaminants posing the greatest threat to human health at the site were arsenic, thallium, benzene, vinyl chloride, PCBs, and seven pesticides. Since 1989, our understanding of the toxicity of these contaminants has developed, and some compounds, such as arsenic, are now known to be more toxic than previously believed. Table 8 shows a comparison between the toxicity factors used in the initial risk assessment and the current toxicity factors for these contaminants.

In addition, there are now non-cancer reference doses for inhalation exposure, which were not available at the time of the original risk assessment. Note, however, that the inhalation pathway, as well as the direct exposure and inhalation of dust particles pathways, are currently incomplete at the site because the remedy prevents direct contact and incidental inhalation of site soils. Table 8 summarizes toxicity-factor changes.

The Amended ROD adopted soil gas performance standards based on the EPA Region 9 Preliminary Remediation Goals (PRGs) for ambient air and applying an attenuation factor of 100 to account for dilution of a soil gas contaminant to in-business air. Table 7 compares the PRGs used at the time of the Amended ROD and the comparable 2013 Regional Screening Levels (RSLs) for industrial air.

For most of the contaminants, the 2014 RSL exposure levels are higher than the PRGs identified in the Amended ROD (Table 8), indicating that the criteria in the Amended ROD are conservative and protective. Three compounds now have screening values lower than the PRG values: 1,2,4-

Trimethylbenzene, ethylbenzene, and trichloroethene. The impacts associated with these changes are not outside of EPA's acceptable risk range.

Table 7. Comparison of Ambient Air PRG (Amended ROD) to Current Industrial Air RSL (2014)

Contaminant	Media	Ambient Air PRG ⁽¹⁾		2014 Industrial Air RSL (µg/m ³)
		ppbv	(µg/m ³)	
1,2-Dichloroethane	Air	0.02	0.32	0.47
1,1-Dichloroethene	Air	0.01	0.04	88
1,2,4-Trimethylbenzene	Air	1	4.9	3.1
1,2-Dichloroethene (cis)	Air	9	35	-
1,2-Dichloroethene (trans)	Air	20	79	-
1,2-Dichloropropane	Air	0.02	0.09	1.2
1,3,5-Trimethylbenzene	Air	1	4.9	-
1,2-Dibromoethane	Air	0.001	0.01	0.02
1,1,1-Trichloroethane	Air	180	981	2200
Carbon Tetrachloride	Air	0.021	0.13	2
Benzene	Air	0.1	0.32	1.6
Chloroform	Air	0.02	0.1	0.53
Ethylbenzene	Air	250	1084	4.9
Methane	Air	--	--	--
Xylene	Air	200	--	--
Tetrachloroethene	Air	0.5	3.39	18
Toluene	Air	100	376	2200
Trichloroethene	Air	0.2	1.07	0.88
Vinyl Chloride	Air	0.1	0.25	2.8

Values shown in bold type indicate a decrease from the value used in the ROD.

(1) Converted from ppbv (unit in ROD) to µg/m³ for comparison to current Industrial Air RSL

Table 8. Comparison of Toxicity Factors Used in the Risk Assessment (1989) Compared to Current Toxicity Factors (2013)

Chemical	Ingestion Exposure				Inhalation Exposure			
	RfDo mg/kg day		SFo (mg/kg/day) ⁻¹		RfCi mg/m ³		IUR (ug/m ³) ⁻¹	
	1989	Current	1989	Current	1989	Current	1989	Current
Aldrin	0.00003	0.00003	17	17	-	-	17	17
Arsenic	0.001	0.0003	2.0	1.5	-	0.00003	5	15
Benzene	-	0.004	0.029	0.055	-	0.03	0.029	0.027
Chlorodane	0.00006	0.0005	1.3	0.35	-	0.0007	1.3	0.35
DDT	0.0005	0.0005	0.34	0.34	-	-	0.34	0.34
Dieldrin	0.00005	0.00005	16	16	-	-	16	16
Heptachlor	0.0005	0.0005	4.5	4.5	-	-	4.5	4.55
Heptachlor Epoxide	0.00013	0.00013	9.1	9.1	-	-	9.1	9.1
Lindane	0.0003	0.0003	1.3	1.3	-	-	-	1.1
Polychlorinated Biphenyls	-	-	2.0	2.0	-	-	-	2.0
Thallium	0.00007	0.00006	-	-	-	-	-	-

Chemical	Ingestion Exposure				Inhalation Exposure			
	RfDo mg/kg day		SFo (mg/kg/day) ⁻¹		RfCi mg/m ³		IUR (ug/m ³) ⁻¹	
	1989	Current	1989	Current	1989	Current	1989	Current
Vinyl Chloride	-	0.003	2.3	0.72	-	0.1	-	0.015

Values shown in bold type indicate a difference from the value used in the ROD.

Ecological Review

The Endangerment Assessment (Ebasco, 1989) included a qualitative ecological assessment indicating the site is located in an industrial area and does not represent a significant habitat for wildlife. A subsequent assessment (Hovore & Associates, 1998) determined that there is no evidence of species listed by any federal agency as endangered, threatened, or otherwise sensitive or protected within the site boundaries and that the likelihood of any such species occupying the site is low given its history of surface disturbance, recent remedial activities, and effects of human intrusion from adjacent development. In addition, EPA received assurance from the Department of Interior (December 2002 letter) and the National Oceanic and Atmospheric Administration (September 2002 letter) verifying those organizations had no concerns about ecological receptors at the site. There are no changes in exposure to ecological receptors.

6.4. Data Review

Data reviewed included the site Visit Report, interviews, the Operations, Maintenance and Monitoring (OM&M) Plan, OM&M reports, and cover inspection reports.

The OM&M reports contain reviews of data gathered, project status updates, sampling data collected, and inspection checklists.

Detailed requirements of and inspection parameters for the periodic formal and informal inspections conducted at the site are contained in the Amended ROD and the annual monitoring reports. The annual monitoring reports also describe sampling and other procedures in detail. These documents are listed in Appendix A, List of Documents Reviewed.

Contamination at the site has impacted two media: soil and soil vapor. Contaminants of concern (COCs) in the soil include 11 metals, 7 chlorinated pesticides, 16 volatile organic compounds (VOCs), polyaromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs). The COCs identified for soil gas include benzene, ethylbenzene, toluene, xylene, carbon tetrachloride, chloroform, 1,2-dibromoethane, tetrachloroethene (PCE), 1,1,1-trichloroethane (1,1,1-TCA), trichloroethene (TCE), vinyl chloride, 1,2-dichloropropane, and methane. Groundwater is monitored to check for any new impacts. The chemicals identified for long-term groundwater monitoring include arsenic, lead, manganese, mercury, PCE, TCE, benzene, toluene, xylene, carbon tetrachloride, chloroform, and vinyl chloride.

During the course of this data review no issues or concerns regarding protectiveness of the remedy were noted.

A summary of observations from the data review are listed below. Refer to Figure 2 and Figure 3 (above) and Figure 4 (below) for locations of the remedy components and treatment systems listed in this Section.

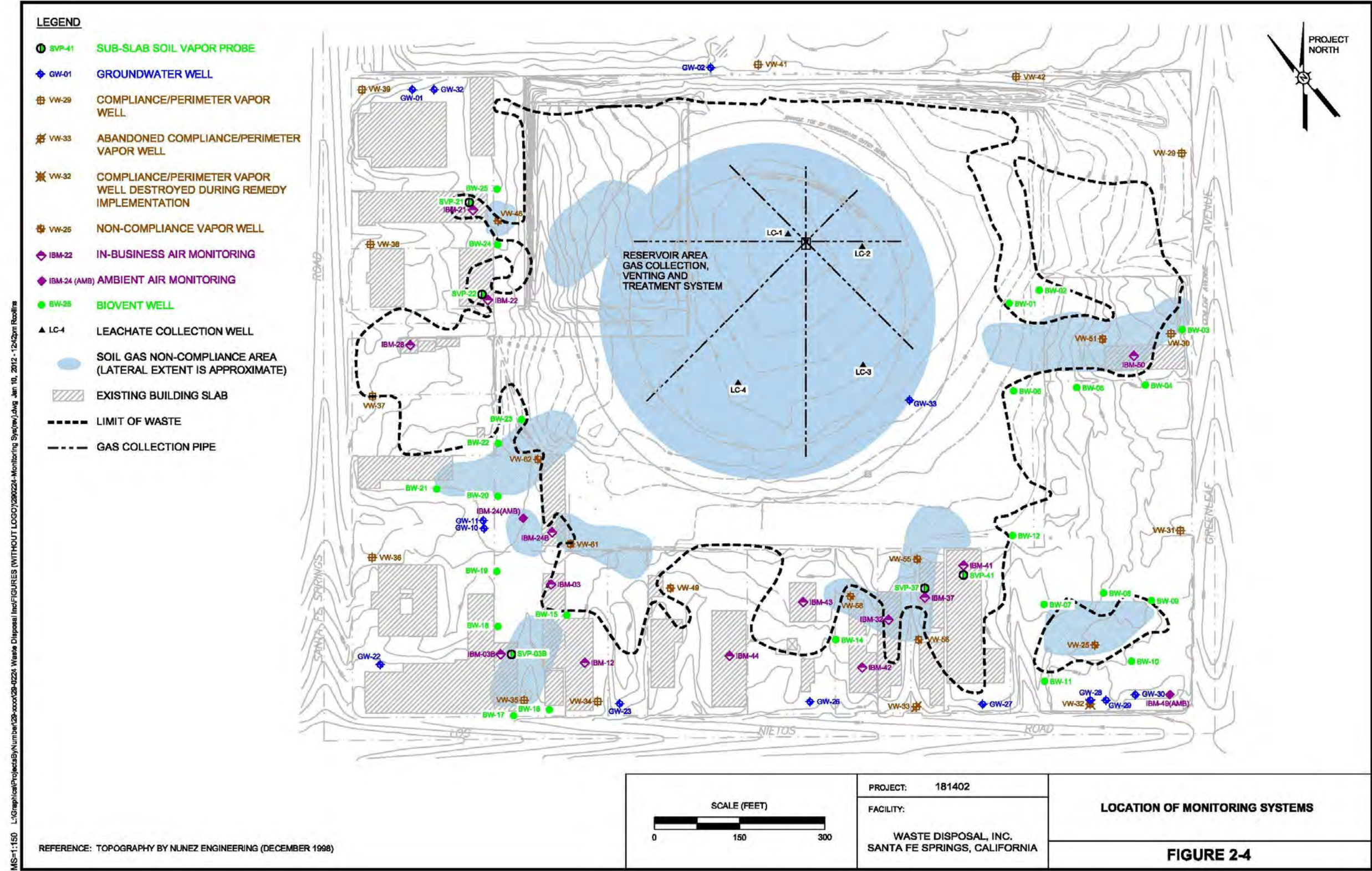


Figure 4. Location of Monitoring Systems

RCRA Subtitle C- and Subtitle D-Equivalent Covers (C and D Covers): The most recent formal inspection for which a report has been prepared was in August 2012. Informal inspections are also performed by the designated inspection engineer at various times. The covers are inspected for signs of erosion, settlement, vegetative growth, and cracks and fractures in asphalt/concrete surface areas. No significant problems have been identified to date. Some minor cracks noted during the inspection were repaired in January 2013.

The annual land survey was conducted in September 2012 and detected no significant settling. The settling that was observed ranged from 0.1 to 0.24 feet from the baseline survey in January 2005.

Building Modifications: WDIG performs annual inspections of building floors and foundations. No significant problems have been identified since the last FYR. In August 2012, cracks were observed in one building in Parcel 03; two sets of parallel gouges were observed in the asphalt at Parcel 23; surface cracks in the concrete pad of vapor well VW-21 were observed. Crack repairs were conducted in January 2013.

Passive Bio-vent Wells: WDIG inspects these wells semi-annually. No problems have been reported since the last FYR. Baroball valves in bio-vent wells BW-15, -18, -19, and -24 were replaced in August 2011. The bio-vent wells are not sampled; their purpose is to allow air infiltration for natural biodegradation.

Vapor Monitoring Well/Groundwater Monitoring Well Inspections: WDIG inspects these wells during each sampling event. No issues or deficiencies were noted in the vapor or groundwater monitoring wells.

Storm water Drainage System: The semi-annual inspections have not noted significant issues. Minor erosion has been noted in the drainage swale near the northwest fence, but is not significant enough to require repair.

Site Security: WDIG performs a formal annual inspection, but informal inspections are also conducted during frequent site visits for various other purposes. There have been no significant problems with site security. Minor repairs to fencing and graffiti removal are recurrent minor issues.

Landscape and Vegetation Maintenance: WDIG crews conduct annual inspections and maintenance of the site's landscaping and vegetation. Activities include mowing, vegetation replacement, pruning, weeding, and housekeeping. Cap vegetative cover is in the informally accepted nominal range, above 70 percent.

Leachate Monitoring and Control System: Leachate wells 1 and 3 are monitored and bailed monthly in accordance with the modified OM&M Plan of June 2013. The automatic recovery systems in Wells 2 and 4 have functioned nominally. No issues have been noted. Collected liquids are disposed of off-site.

Reservoir Gas Collection System: Since December 2007, after a written request from WDIG was approved by EPA, the reservoir gas collection system has operated in passive mode due to very low rates of gas generation, less than 0.1 lb/day. South Coast Air Quality Management District regulations require treatment if the emission rate of total VOCs is above 1.0 lb/day. WDIG inspects the system semi-

annually. No issues of concern with the operation of the reservoir gas collection system have been reported. Methane and Total Gaseous Non-Methane Organics (TGNMO) levels in the reservoir area are decreasing, and continue to be below active mode criteria. Methane concentrations ranged from 2 to 4,800 ppmv, and TGNMO concentrations ranged from 6 to 16 ppmv. VOC generation remains below the active mode criteria, 1.0 lb/day.

In-business Air Monitoring (IBM): Indoor air and sub-slab soil vapor sampling using Soil Vapor Probes (SVP) is accomplished quarterly. Table 9 and Table 10 present the results from the MY2012 Annual Maintenance and Monitoring Status Evaluation Report (Project Navigator, 2013). The results indicate that most of the constituents analyzed are at concentrations below the Indoor Air Threshold Levels (IATLs). Benzene and toluene were detected above IATL in three of the 10 in-business air sampling locations, but the detections and amounts detected vary inconsistently from quarter to quarter.

Typical chemicals used by tenants at in-business air sampling locations (from inventory lists or from observation by inspection/sampling teams) include: various paints containing benzene, acetone, and other chemicals; gas cylinders containing argon, oxygen, 1,1,1-2-tetrachloroethane, acetylene, and propane; brake parts cleaners and other industrial cleaners; various lubricant products including oil; paint remover and paint thinner; adhesives; bleach; glues and resins; saturated oil absorbent pads; grease; hydraulic fluid; gasoline (which contains benzene); diesel fuel; ethylene glycol; among others. Several chemicals of concern (COCs), including benzene, PCE, TCE, and toluene, are often found in such industrial-type chemicals, although they are not always listed as ingredients on the container labels.

During inspections and sampling events, inspectors and sampling team members make observations of the chemicals in use and stored within the businesses they inspect/sample.

In-business air monitoring results do not indicate that gas migration from soil to in-business air locations is occurring. The in-business presence of these chemical constituents is most likely associated with tenants' activities.

- There is no correlation between IBM and SVP results.
- Detections and exceedances are inconsistent at every location where samples were collected, from both the in-business air and from the sub-slab probes. There were only a few, inconsistent instances where the sub-slab concentrations were equal or greater than the In-business concentrations. This is evidence that indoor concentrations are from chemicals used by businesses and not site related.
- The data show inconsistent exceedances of IATLs at a few businesses which would be expected in an environment where sporadic use of chemicals occurs, though inconsistent results were also obtained from the sub-slab vapor probes.
- Indoor air concentrations of both benzene and PCE exceed the soil vapor concentrations in nearby vapor monitoring wells, adding further weight to the source of the chemicals being in-business rather than site-related, since concentrations migrate from high concentration to low concentration, not vice versa. The floor slabs in all the site structures are intact with no indications of breaches or other exposure pathways.

In accordance with the modified OM&M Sampling Program, in-business air monitoring will continue to be conducted on a quarterly basis, and also in accordance with the modified plan, the number of analytic constituents was reduced to consist of methane, trichlorofluoromethane, trichlorofluoroethane, benzene, TCE, PCE, and toluene.

Elevated levels of trichlorofluoromethane (Freon-11) and trichlorotrifluoroethane (Freon-113) have been detected in soil gas samples at the northwest corner of the site, at Probe SVP-21 (Parcel 21). In-business air sampling at Probe SVP-21 shows some detections of these constituents, but not at levels that indicate unacceptable risk for indoor air. In addition, the presence of Freon vapors indoors is consistent with ongoing business activities which involve handling, demolition, and distribution of refrigeration systems and coolants. EPA is continuing to track the occurrence of these constituents and will coordinate with PRPs, tenants who conduct business activities within the site boundaries, and state regulatory agencies.

An opportunity for optimization would be to obtain new inventory lists for chemicals in use at the in-business sample locations. Observations by inspection and sampling team members are critical, and should augment a complete and up-to-date inventory list, but observation alone cannot detect chemicals not currently in use and stored on site, that may have been used the day before or after the inspection teams arrived/departed the site. The most current inventory lists were provided in 1999. Nine of the twelve locations have new tenants who have not provided inventory lists, and none of the lists have been updated. Updated inventories will help validate that the IATL exceedances are tenant related, not site-related. Regular updates of chemical inventories could possibly be added to the OM&M Plan.

Table 9. In-Business Air Monitoring (IBM) for MY12 (October 2011 to December 2012) Sampling Event Detectable Results of COCs

Sample Location	Sample Event Date	Trichloro-ethene (TCE)	Toluene	Trichloro-fluoro-methane	Trichloro-fluoro-ethane	Tetra-chloro-ethene (PCE)	Benzene
		All concentrations are in parts per billion by volume (ppbv)					
IATL		0.56	212	N/A	N/A	10.6	2
IBM-03	10/7/11	ND	2.2	ND	ND	ND	ND
	2/24/12	ND	3.1	ND	ND	ND	ND
	7/27/12	ND	4.6	0.39	ND	ND	0.95
	11/16/12	ND	1	0.25	ND	ND	0.68
IBM-03B	10/7/11	ND	ND	ND	ND	ND	ND
	1/27/12	ND	7.6	ND	ND	ND	1.3
	4/27/12	ND	2.2	ND	ND	ND	ND
	7/7/12	ND	ND	ND	ND	ND	ND
	9/29/12	ND	11	0.52	ND	ND	1.7
IBM-21	2/19/12	ND	8.9	69	ND	ND	1.1
	5/18/12	ND	40	100	ND	ND	4.3
	12/2/12	ND	9.9	16	ND	ND	7.6

Sample Location	Sample Event Date	Trichloro-ethene (TCE)	Toluene	Trichloro-fluoro-methane	Trichloro-fluoro-ethane	Tetra-chloro-ethene (PCE)	Benzene
		All concentrations are in parts per billion by volume (ppbv)					
IATL		0.56	212	N/A	N/A	10.6	2
IBM-22	10/28/11	ND	4.7	ND	ND	ND	1.3
	2/24/12	ND	9.2	ND	ND	ND	1.6
	4/22/12	ND	10	ND	ND	ND	1.6
	8/10/12	ND	28	4	ND	ND	4.4
	9/28/12	ND	25	0.63	ND	ND	2.5
IBM-24AMB	10/7/2011	ND	ND	ND	ND	ND	ND
	2/24/12	ND	ND	ND	ND	ND	ND
	4/20/12	ND	ND	ND	ND	ND	ND
	7/6/12	ND	ND	ND	ND	ND	ND
	9/21/12	ND	0.53	0.32	ND	ND	0.25
IBM-24B	10/7/2011	ND	ND	ND	ND	ND	ND
	3/2/12	ND	2.5	ND	ND	ND	ND
	4/20/12	ND	1.3	ND	ND	ND	ND
	7/6/12	ND	1.5	ND	ND	ND	ND
	9/21/12	ND	0.72	0.43	ND	ND	0.27
IBM-28	10/7/2011	ND	ND	ND	ND	ND	ND
	2/17/12	ND	ND	ND	ND	1.5	ND
	4/21/12	ND	ND	ND	ND	ND	ND
	7/6/12	ND	ND	ND	ND	ND	ND
	11/16/12	ND	0.72	0.27	ND	ND	0.46
IBM-32	2/2/2012	ND	3	ND	ND	ND	ND
	4/27/12	ND	3.2	ND	ND	ND	ND
	7/6/12	ND	1.7	1.3	ND	ND	ND
	11/30/12	ND	2.3	0.31	ND	ND	0.74
IBM-37	2/2/12	ND	35	ND	ND	ND	1.7
	5/3/12	ND	14	ND	ND	ND	1.2
	7/6/2012	ND	16	ND	ND	ND	1.2
	9/27/12	ND	10	0.45	ND	ND	0.82
IBM-41	1/28/12	ND	600	ND	ND	ND	40
	4/14/12	ND	58	ND	ND	ND	ND
	7/28/12	ND	47	0.32	ND	0.45	4.7
	11/10/12	ND	2.3	0.21	ND	ND	0.95
	1/28/12	ND	1.6	ND	ND	ND	ND

Sample Location	Sample Event Date	Trichloro-ethene (TCE)	Toluene	Trichloro-fluoro-methane	Trichloro-fluoro-ethane	Tetra-chloro-ethene (PCE)	Benzene
		All concentrations are in parts per billion by volume (ppbv)					
IATL		0.56	212	N/A	N/A	10.6	2
IBM-49AMB	7/2/12	ND	ND	ND	ND	ND	ND
	9/27/12	ND	1.1	0.34	ND	ND	0.41
IBM-50	1/28/12	ND	2.3	ND	ND	ND	ND
	4/21/12	ND	ND	ND	ND	ND	ND
	8/11/12	ND	0.29	0.37	ND	ND	ND
	9/22/12	ND	0.35	0.36	ND	ND	0.21

Highlighted values indicate an exceedances of the Indoor air threshold level (IATL)

Field duplicates were not included in this table and were of similar concentrations.

ND denotes non-detect

Table 10. Soil Vapor Probe (SVP) Monitoring for MY12 (October 2011 to December 2012) Sampling Event Detectable Results of COCs

Sample Location	Sample Event Date	Trichloro-ethene (TCE)	Toluene	Trichloro-fluoro-methane	Trichloro-fluoro-ethane	Tetra-chloro-ethene (PCE)	Benzene
		All concentrations are in parts per billion by volume (ppbv)					
SVP-03B	10/10/11	ND	ND	ND	ND	ND	ND
	2/25/12	ND	ND	ND	ND	ND	ND
	4/30/12	ND	ND	ND	ND	ND	ND
	7/30/12	ND	5.2	ND	ND	ND	0.8
	10/1/12	ND	4.4	ND	ND	ND	1.6
SVP-21	2/20/12	ND	ND	22000	93	70	ND
	12/3/12	0.33	4.1	310	6	15	1.2
SVP 22	10/29/11	ND	5.2	ND	ND	ND	1.4
	2/25/12	ND	ND	ND	ND	1.2	ND
	4/23/12	ND	3.8	ND	ND	ND	ND
	8/13/12	ND	0.29	0.74	ND	ND	0.2
	10/1/12	0.29	1.6	0.35	ND	0.79	0.66
SVP-37	2/3/12	1.2	7.1	ND	ND	9.4	ND
	5/4/12	ND	1.3	ND	ND	6.8	ND
	7/9/12	ND	1.8	ND	ND	ND	ND
	9/28/12	ND	0.34	0.33	ND	ND	ND
SVP-41	1/30/12	ND	19	ND	ND	ND	2.1
	4/16/12	ND	17	ND	ND	1	1.7

Sample Location	Sample Event Date	Trichloro-ethene (TCE)	Toluene	Trichloro-fluoro-methane	Trichloro-fluoro-ethane	Tetra-chloro-ethene (PCE)	Benzene
All concentrations are in parts per billion by volume (ppbv)							
	8/1/12	ND	4.2	0.36	ND	ND	0.76
	11/12/12	ND	31	ND	ND	0.88	1.3

ND denotes non-detect

Vapor Well Sampling: Analysis results from monitoring of vapor wells for compliance from this reporting period continued to indicate minimal to no gas migration from the remaining waste.

Vapor wells (VW) are either “compliance” or “non-compliance” and are discussed separately. Compliance vapor wells are located along the perimeter of the Site and are used to monitor migration of soil vapors offsite and toward nearby buildings. Non-compliance vapor wells are located in or near areas of historic non-compliance (contaminants present above SGPS).

Compliance vapor wells: There are 25 nested wells at 11 locations around the site perimeter. The only constituents that have been detected at concentrations above Soil Gas Performance Standards (SGPS) in the compliance vapor wells during this period are benzene, chloroform, and trichloroethene (TCE), and are historically consistent with background levels. During the most recent sampling event in 2012, only TCE was detected above SGPS (at 590 ppbv versus SGPS of 200 ppbv), and only in one well in the First and Third Quarter sampling rounds.

Non-compliance vapor wells: There are 25 nested wells at 9 locations adjacent to on-site structures and in the site interior near areas of historic non-compliance. According to the most recent OM&M report, (Project Navigator, LTD, 2012), results of sample analysis from non-compliance vapor wells show methane concentrations have decreased significantly, in some cases by several orders of magnitude, from concentrations detected prior to remedy implementation. VOC concentrations for the COCs show little overall change in the last five years. Overall, the data show that soil gas monitored by the vapor wells has decreased since remedy implementation.

Groundwater Monitoring: Groundwater monitoring results from the last five years are consistent with the EPA’s earlier findings that remaining site waste contaminants are not migrating into the groundwater. Based on the results, site constituents have not impacted groundwater. This assessment has been documented since monitoring began in 1999.

The locations of the groundwater monitoring wells were chosen to provide data to establish background groundwater contaminant concentrations, point of compliance (down gradient site boundary) concentrations, near-source detection concentrations, and verification. See Figure 4 for well locations. The groundwater monitoring wells include both shallow- and deep-screened well intervals.

Although several COCs (VOCs and metals) were detected at concentrations above their respective State drinking water MCLs in groundwater samples, these exceedances were not related to site waste based on their distribution in groundwater.

In sampling events in the last five years, the only well with consistent detections of TCE and PCE was GW-11. All other monitored wells had inconsistent/intermittent detections of various COCs below MCLs or no detections. PCE and/or TCE were inconsistently detected in GW-01, GW-11, GW-22, and GW-23. (Refer to Figure 4 for well locations). The only well with VOC (TCE and PCE) detections above the MCL is GW-11. GW-11 is screened deep, to 128 feet bgs; therefore the source of the contaminants in GW-11 is unlikely to be associated with the WDI site. The other wells listed above, including GW-11, are located up-gradient and cross-gradient to site contaminant sources. The VOC presence in these wells was determined to indicate contamination from an up-gradient, off-site source.

Shallow- and intermediate-depth monitoring wells, including wells located immediately adjacent to GW-01 and GW-11, such as GW-10, show predominantly non-detects or minor detections at concentrations below MCLs.

Statistical Trend Analysis: The WDIG performs statistical trend analysis on the non-compliance vapor well and groundwater analytical data to evaluate trends and compare post remedy concentrations of soil gas and groundwater COCs with concentrations from previous sampling events in order to identify any statistically significant concentration changes that might occur.

The tool used to conduct the statistical analysis is the computer program DUMPStat, developed by Discerning Systems, Inc, using the Shewhart-CUSUM (cumulative sum) control chart method, in which the most recent data collected is compared to data from the last eight sampling events. Data from the last eight events is used to establish “control limits”, or “background”. The limit is based on the rationale that if the COC concentrations in a well remain constant, or at background levels, new observations should not deviate substantially from the baseline mean. If there is a change, such as a release, the standardized values will deviate significantly from baseline and tend to exceed the control limit.

In this methodology, a statistically significant change, or a data point that falls outside the control limit, is termed an exceedance. A statistical analysis exceedance is not the same as a detection that exceeds an MCL, for example. During the period since the last FYR, for primary COCs, there were no exceedances in the non-compliance vapor well analytical data, and there were no exceedances in the groundwater monitoring analytical data.

6.5. Site Inspection

The WDI site inspection was accomplished on 23 January 2014. Personnel present at the site inspection were: U.S. Army Corps of Engineers (USACE) representatives Ellen Engberg and Blair Kinser; Project Manager Michael Skinner, representing the WDIG Trust; and Project Coordinator Raudel Sanchez, representing Project Navigator, Ltd.

The site was inspected visually by walking the perimeter of the site and a few buildings. A check on required documents, records, logs, and reports was conducted, and all documentation was verified as present and complete.

Overall, the site was in good condition, with no discrepancies or points of concern noted. The site inspection concluded that the remedy was functioning as designed, and no recommendations were identified.

For more details from the site inspection, refer to the Site Inspection Checklist in Appendix D.

6.6. Interviews

During the FYR process, an interview was conducted with Michael Skinner, Principal of Environmental Management Strategies. The purpose of the interview was to document the perceived status of the site and any perceived problems or successes with the phases of the remedy that have been implemented to date. The interview was conducted during the site visit on January 23, 2014. The interview is summarized below and the complete interview record is available in Appendix C.

Overall, Mr. Skinner's impression is that the project is successful and that there are good relations with the county, school, and other stakeholders. He was familiar with the O&M requirements and monitoring results. He suggested that landscaping on the site be changed to more native species. Mr. Skinner indicated that additional re-development of the site would be appropriate to consider since the site is very stable.

6.7. Institutional Controls

EPA's selected remedy includes a significant ICs component selected in the Amended ROD issued in June 2002. Twenty-two site parcels are protected by Land Use Controls (LUCs) in the form of Environmental Restriction Covenants (ERCs or covenants).

The ERCs, which have been recorded for each parcel, place numerous restrictions on land and water uses and provide notice to prospective purchasers or other users of the parcel about the status and condition of the site. Among other restrictions, the ERCs prohibit residential land use and require EPA's review and prior written approval for an extensive list of activities that could potentially damage the engineered capping and monitoring systems.

Each of the ERCs has been made by and between the parcel owners (Owners) and the WDI Site Trust and function to restrict the use of the property to protect human health, safety, and the environment. Each ERC includes an explicit statement of the parties' intent that the covenant be for the benefit of EPA and the California Department of Toxic Substances Control (DTSC) as third-party beneficiaries.

The ERCs all include summaries of the facts, definitions, general provisions, and a list of specific restrictions. The land use restrictions run with land; are binding upon owners and occupants (e.g., tenants); include notifications of hazardous substances; and must be incorporated in to deeds, leases and conveyances of property (e.g., sales).

The ERCs also include extensive land use restrictions (Prohibited Uses) intended to prevent human exposure to harmful waste materials and protect the integrity of the completed remedy. The ERCs require Owners to maintain any necessary engineered capping systems and engineering controls for any new structures or building that may require city building permit, as specified by EPA. Owners may not use, or allow others to use, the property in a manner that may interfere with or adversely affect the implementation, integrity, or protectiveness of response actions required by EPA for the selected remedy.

The WDIG has been implementing an EPA-approved ICs Monitoring and Enforcement Work Plan (ICMEWP) under EPA oversight. The ICMEWP is an "evergreen" document that can be updated on a

periodic basis, and is in fact currently undergoing review and update by WDIG and EPA. The WDIG implements the ICMEWP through (1) a combination of detailed parcel-specific site inspections and (2) an extensive internet-based monitoring program designed to detect potential changes in property ownership, tenancy, financial status, land use, permitting, and upcoming construction. As part of the IC monitoring program, the WDIG contracts with a specialty contractor who provides notifications and alerts to WDIG and EPA in real time for follow-up action. The results of the ICMEWP implementation are included in the annual OM&M reports.

EPA reviewed the ICs work plan and reporting as part of this FYR. Specifically, EPA evaluated the parcel-specific inspection procedures, as well as the internet-based ICs monitoring program, and concluded that the monitoring and enforcement of ICs are being conducted in a manner that remains protective. EPA did not identify any issues that affect remedy protectiveness or need formal resolution through the FYR process. EPA provided a number of recommendations for enhancements and will be working with the WDIG in the coming year to update the ICMEWP and reporting formats. Please refer to Appendix F for further details.

7. Technical Assessment

7.1. Question A: Is the remedy functioning as intended by the decision documents?

The remedy functions as designed, with the minor exception of the Reservoir Gas Collection system which was converted from active to passive operation earlier than originally anticipated in 2007 due to low recovery levels. The remedial actions meet the performance standards described in the Amended ROD. IATLs for indoor air are occasionally exceeded, but data indicates these exceedances are the result of business activities. Natural attenuation of the soil gas is ongoing. Groundwater remains unaffected by WDI site contamination, and indoor air in the businesses around the site periphery appears to be unaffected by soil gasses as evidenced by the continuing monitoring programs. Site contaminants remain contained beneath the RCRA C and D Covers.

The operations and maintenance procedures and activities at the site maintain the effectiveness and integrity of the response actions. There appear to be no significant variances in annual O&M costs, and no potential problems or issues are evident.

The OM&M Plan was updated in June 2013, and included optimized procedures for sampling frequency and constituents sampled. The annual O&M costs are undergoing review by WDIG and EPA.

There have been no problems, breakdowns, deficiencies, changes, or problems that could indicate potential issues or that could place protectiveness at risk.

During the site inspection on 23 January 2014, no information came to light and no observations were made that would suggest the ICs are other than properly implemented, fully enforced, and adequate.

The Institutional Controls Monitoring and Enforcement Work Plan is undergoing review and update by WDIG and EPA.

7.2. Question B: Are the exposure assumptions, Toxicity Data, Cleanup Levels, and Remedial Action Objectives (RAOs) Used at the Time of Remedy Selection Still Valid?

Yes, the exposure assumptions, toxicity data, cleanup levels, and RAOs are still valid. A discussion supporting this is presented below.

Changes in Standards and TBCs

Cleanup standards have not changed since the 2002 Amended ROD. Therefore, the cleanup standards are protective. There are no newly promulgated standards that affect the protectiveness of the remedy.

Changes in Exposure Pathways

There have been no significant changes to either existing or anticipated land use on or near the WDI site. There have been no newly identified contaminants or contaminant sources since remedy implementation. There have been no unanticipated toxic byproducts of the remedy not previously addressed. There has been no change to the physical site conditions other than that resulting from the required remedial actions that could affect the protectiveness of the remedy. The cap integrity has been evaluated and the engineered capping systems are performing as designed.

Changes in Toxicity

The Amended ROD did not identify remedial action levels (cleanup levels) for soil COCs because the selected remedy relies on capping rather than excavation. However, an evaluation of changes in toxicity factors for those compounds driving the risks and hazards associated with site soils was conducted. While there have been changes in toxicity factors (the values for reference doses for inhalation) used in the initial risk assessment, the conservative nature of the exposure assumptions (assuming Residential use) in conjunction with the exposure pathways evaluated, indicate that the risk assessment is still valid because the implemented remedy prevents direct contact and incidental inhalation of site soils.

The Amended ROD's performance standards for soil vapor COCs are based on modified Region 9 Ambient Air PRGs. In 2013, EPA Region 9 updated its screening values and some procedures for screening environmental risks. EPA now uses updated screening levels as presented in the 2013 Regional Screening Levels (RSLs). The current inhalation risk screening values are the Region 9 Regional Screening Levels (RSLs) for industrial air. There have been a number of changes to the ambient air PRGs/RSLs. However, the majority of the revisions entail increases of the PRG/RSL values from lower to higher values, which indicates that the criteria established in the 2002 Amended ROD are conservative and protective. None of the PRG/RSL changes affect protectiveness of the remedy. EPA has reduced screening levels for four compounds: 1,2 dibromoethane, ethylbenzene, tetrachloroethene, and xylene. Based on review of site data those changes do not result in any reduction of protectiveness.

The 2013 RSLs provide updated standards for industrial air. For all but four VOCs at WDI, the former PRGs are more conservative standards, and hence the remedy remains protective. With respect to the four VOCs with new RSLs, the risks associated with using the newer more conservative RSLs still fall within the EPA's acceptable risk range. EPA's updating of the screening levels for soil vapor from PRGs to the 2013 RSLs does not call protectiveness of the remedy into question. Therefore the standards in the Amended ROD are appropriate and protective.

Expected Progress towards Meeting Remedial Action Objectives

EPA selected the following RAOs for the site: (1) protect human health and the environment by preventing exposure to buried wastes and contaminated soils; (2) protect current and future on-site and off-site receptors from exposure to soil gases; (3) prevent human exposure, from direct contact, consumption, and other uses, to site liquids with contaminant concentrations that exceed state and federal standards; (4) prevent site liquids from contributing to exceedances of state and federal groundwater standards; and (5) prevent human exposure to groundwater that exceeds state and federal standards due to site-related contaminants.

These objectives recognize (1) the present use of the site, (2) the anticipated potential for future use of the site for industry, and (3) the potential for groundwater in the area to be used as a public water supply. The remedial actions are currently achieving the RAOs. Site data indicate that all exposure routes remain incomplete.

7.3. Question C: Has Any Other Information Come to Light That Could Call Into Question the Protectiveness of the Remedy?

During the course of this FYR, no information came to light that could call into question the protectiveness of the remedy. No new ecological risks were found, and no natural disasters occurred in the last five years.

7.4. Technical Assessment Summary

All components of the remedy are functioning as designed and maintain protectiveness. No issues with O&M or ICs have been identified. Original exposure assumptions and RAOs remain valid. No new information has come to light that could call remedy protectiveness into question.

8. Issues

No issues that affect or could potentially affect current or future protectiveness were noted during the course of this FYR.

9. Recommendations and Follow-up Actions

For this Five Year Review, no issues that affect protectiveness were raised, and there are therefore no recommendations for this site.

In addition, the following Follow-up Actions enhancements, which do not directly affect protectiveness but would provide technical improvement, are provided:

- Update in-business chemical inventories. The current inventory is significantly out of date and largely incomplete. The Indoor (in-business) Air Monitoring program would directly benefit from having updated and accurate chemical use inventories. The inventory should be updated at least annually, and could be incorporated into O&M procedures.
- The liquids collected from the Leachate Control and Monitoring System should be analyzed for contaminants, and if found, the source should be identified.
- Institutional Controls (ICs): The current Institutional Controls Monitoring and Enforcement Work Plan (ICMEWP) is out of date. EPA plans to work with the WDIG to address (1) updating of the ICMEWP, and (2) updating of the reporting format for the annual OM&M reports to provide additional detail regarding site inspections and, particularly, internet-based IC monitoring activities.
- Optimization for Indoor Air Monitoring: Opportunities may exist to continue to optimize the indoor air monitoring program. EPA will continue to work with the WDIG to evaluate the indoor air monitoring program, including monitoring, chemical use inventories, and indoor inspections, to assess the integrity of the capping remedy and demonstrate compliance with performance standards.

10. Protectiveness Statement

The remedy is protective of human health and the environment. The remedy successfully contains on-site waste, blocks exposure pathways, and prevents direct exposure to contaminated soils. The reservoir gas collection system and engineering controls for on-site structures prevent migration of vapors to on-site indoor air and/or off-site. Groundwater remains unaffected by site contamination.

11. Next Review

This is a statutory review for the WDI site that requires ongoing FYRs as long as waste is left on site that does not allow for unlimited use and unrestricted exposure. The next FYR will be due within five years of the signature date of this FYR.

Appendix A: List of Documents Reviewed

[This page is intentionally blank]

List of Documents Reviewed

Environmental Protection Agency. Waste Disposal Inc Soil and Subsurface Gas Operable Unit Record of Decision. December 1993.

Environmental Protection Agency. Waste Disposal Inc Amended Record of Decision. June 2002.

Project Navigator Ltd. Memo. Recommended OM&M Sampling Program at WDI Superfund Site. February 2011.

Project Navigator Ltd. Waste Disposal Inc (WDI) Annual RCRA Subtitle C and D Equivalent Cover Inspection. October 2012.

Project Navigator Ltd. Waste Disposal Inc (WDI) Annual RCRA Subtitle C and D Equivalent Cover Inspection. December 2013.

Project Navigator Ltd. and TRC Solutions, Inc. MY2011 Annual Operations, Maintenance and Monitoring Report, Waste Disposal Inc. Superfund Site. July 2012.

Project Navigator Ltd. and TRC Solutions, Inc. MY2012 Annual Operations, Maintenance and Monitoring Report, Waste Disposal Inc. Superfund Site. May 2013.

Project Navigator Ltd. and TRC Solutions, Inc. Operations, Maintenance, and Monitoring Plan (OMMP). June 2013.

USACE. Five Year Review Report for Waste Disposal Inc. Superfund Site. August 2009

[This page is intentionally blank]

Appendix B: Press Notices

[This page is intentionally blank]

Press Notices



PUBLIC NOTICE
THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
BEGINS SECOND FIVE-YEAR REVIEW OF CLEANUP AT THE
WASTE DISPOSAL, INC. SUPERFUND SITE

The United States Environmental Protection Agency (EPA) has begun the second Five-Year Review of cleanup actions undertaken at the Waste Disposal, Inc., Superfund Site (Site) in Santa Fe Springs, CA. The review will evaluate whether the cleanup actions completed for the Site remain protective of human health and the environment.

SITE HISTORY

The Waste Disposal, Inc. site was originally constructed in 1924 as a storage reservoir for petroleum drilling waste and later hazardous substances, including both liquid and solid wastes. The reservoir was decommissioned in 1963. In 1987, the Site was placed on the National Priorities List (NPL) to address the resulting contamination in the subsurface soils and soil gas beneath the reservoir and some of the surrounding businesses. A Record of Decision was signed in 1993 initiating the cleanup actions and was later amended in May 2001. Construction of the remedy was completed in 2006 and has since been transitioned into long-term operation and maintenance.

CLEANUP OBJECTIVE

The cleanup goals established in the Site's Record of Decision are to protect human health and the environment by preventing exposure to buried wastes and contaminated soils and to prevent site liquids from exceeding state and federal groundwater standards. To achieve these goals, a multi-layer engineered cap and an engineered cap (cover) has been placed over the reservoir and selected areas outside the reservoir. In addition, a landfill gas and a collection and treatment system which addresses potential leaching was installed along with other soil vapor protection measures. Institutional controls, such as deed restrictions and zoning ordinances, and monitoring are also used to ensure the integrity of the remedy over time.

THE REVIEW PROCESS

When EPA's cleanup remedy leaves waste in place or the remedy will take longer than five years to complete, Superfund law requires an evaluation – every five years – of how the constructed remedy is operating and its progress towards achieving the Site's cleanup goals; until the Site has been cleaned up to allow unrestricted access. This Five-Year Review, the second for the Site, will evaluate the short- and long-term protectiveness of human health and the environment. The first was completed in February 2010, and at the time, the cleanup remedy was proceeding as expected and meeting the EPA's goals.

EPA will look at the effectiveness of the remedies, including the engineered capping systems, collection and treatment of gases, collection and removal of site liquids, and institutional controls. EPA will talk with applicable stakeholders and interested members of the public.

Upon completion of the review, a copy of the final report will be placed in the local information repository listed below. EPA will monitor the Site and conduct additional five-year reviews to ensure the long-term protectiveness of the remedy.

COMMUNITY INVOLVEMENT

EPA is always interested in hearing from the public. If you have any issues or concerns about the Waste Disposal, Inc.'s Site cleanup plan or have direct knowledge regarding the operation or implementation of the as-built remedy, EPA would like to talk with you. Please contact Project Manager Russell Mechem or Community Involvement Coordinator Alejandro Diaz at the numbers below.

FOR MORE INFORMATION

Please visit the Site Overview at:
www.epa.gov/region09/wastedisposal

Or visit the information repository to review the administrative record or contact EPA representatives.

INFORMATION REPOSITORY:

EPA Superfund Records Center
95 Hawthorne St.
San Francisco, CA 94105
(415) 536-2000

Santa Fe Springs City Library
11700 East Telegraph Road
Santa Fe Springs, CA 90670
(562) 868-7738
library@santafesprings.org

CONTACT INFORMATION:

Russell Mechem
Remedial Project Manager
75 Hawthorne St. (SFD 7-2)
San Francisco, CA 94105
(415) 972-3192
mechem.russell@epa.gov

Alejandro Diaz
Community Involvement Coordinator
75 Hawthorne St. (SFD 6-3)
San Francisco, CA 94105
1(800) 231-3075 or 1(415) 972-3242
diaz.alejandros@epa.gov

CNS#2592539

From the Whittier Daily News, 26 February, 2014

[This page is intentionally blank]

Appendix C: Interview Forms

[This page is intentionally blank]

Interview Forms

Five-Year Review Interview Record				
Site:	Waste Disposal, Inc. Santa Fe Springs, Ca			EPA ID No:
Interview Type: Site Visit Location of Visit: interview at Corps offices, El Monte, Ca Date: 23 January, 2014 Time: 1400				
Interviewers				
Name	Title		Organization	
Ellen Engberg	Geologist		USACE, Seattle	
Blain Kinser	Env. Engineer		SUACE, Seattle	
Interviewees				
Name	Organization	Title	Telephone	Email
Michael Skinner	Environmental Management Strategies	Principal		mjs@superfundmanagement.com
Summary of Conversation				
<p>1) What is your overall impression of the project? Highly successful- the first five year review stated it well. We have good public relations and relationships with county and school and other key stake holders.</p> <p>2) Is the remedy functioning as expected? How well is the remedy performing? Yes, performing exactly as expected. No issues or problems that indicate a need for change, everything in compliance. Vapor extraction system was running actively as a precaution, but only proved that it only needed to be run passive, as originally expected.</p> <p>3) What does the monitoring data show? Are there any trends that show contaminant levels are decreasing? Data shows decreasing trends overall. The contamination is not going anywhere contained- so it's not going anywhere, and even the liquid removed from the contained area is decreasing. EPA has approved lesser frequency of monitoring as a result.</p> <p>4) Is there a continuous O&M presence? If so, please describe staff and activities. If there is not a continuous on-site presence, describe staff and frequency of site inspections and activities. Yes- TRC manages the O&M. In business air sampling- Semi-Annual Soil Gas- Annual Cracks inspected as per RCRA cap inspection- Annual Soil Gas- Annual Goundwater- Annual upstream wells watching for Omeg Plume- Semi-annual Liquid phase extraction on hand bailed wells- every 2 weeks Liquid phase auto-wells- every 4-6 months Landscaping (onsite presence, not part of remedy)- monthly</p> <p>5) Have there been any significant changes in the O&M requirements, maintenance schedules, or sampling routines in the last five years? If so, do they affect protectiveness of the remedy? Please describe changes and impacts. There have been reductions in monitoring. We will send an EPA approved memo with that information of the reduction. All facets of the O&M have been changed from the original version of the O&M requirements.</p> <p>6) What are the annual operating costs for your organization's involvement with the site? About \$500,000.00/ Year.</p>				

- 7) Have there been unexpected O&M difficulties or costs at the site in the last five years? If so, please give details.
Nothing unexpected. Reduction in cost from the decreases in monitoring.
- 8) Have there been opportunities to optimize O&M or sampling efforts? Please describe changes and resultant or desired cost savings or improved efficiency.
Yes, there has been a reduction in sampling frequency - the memo mentioned in question 5 will have that information.
- 9) Are you aware of any changes in Federal/State/County/Local laws and regulations that may impact the protectiveness of the remedy?
No.
- 10) Do you have any comments, suggestions, or recommendations regarding the project?
Change the landscaping to native species, and less irrigation- working on this. We would like to quit the liquid pumping, however we are aware that this is a state ARAR, and the state would have to approve it.

Additional Site-Specific Questions

1. What are your feelings about site re-development?

The group (PRP) is looking to redevelop the land and sell to developers. The town is encouraging this too, as it would be good for the community. This is appropriate, as the remedy is very stable- No subsidence, no erosion.

2. What is the status of the signage on site?

The City graffiti task force cleans the signs whenever they are tagged. There are 3 sets of bilingual signs around the perimeter fencing.

Appendix D: Site Inspection Checklist

[This page is intentionally blank]

Site Inspection Checklist

Five-Year Review Site Inspection Checklist

I. SITE INFORMATION													
Site name: Waste Disposal, Inc.	Date of inspection: 23 January, 2014												
Location: Santa Fe Springs, Ca	EPA ID: CAD980884357												
Agency, office, or company leading the five-year review: corps of engineers, seattle	Weather/temperature Warm, clear												
Remedy Includes: (Check all that apply) <table border="0"> <tr> <td><input checked="" type="checkbox"/> Landfill cover/containment</td> <td><input type="checkbox"/> Monitored natural attenuation</td> </tr> <tr> <td><input checked="" type="checkbox"/> Access controls</td> <td><input type="checkbox"/> Groundwater containment</td> </tr> <tr> <td><input checked="" type="checkbox"/> Institutional controls</td> <td><input type="checkbox"/> Vertical barrier walls</td> </tr> <tr> <td><input type="checkbox"/> Groundwater pump and treatment</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Surface water collection and treatment</td> <td></td> </tr> <tr> <td><input checked="" type="checkbox"/> Other: <i>e.g. Groundwater monitoring</i></td> <td></td> </tr> </table> <p>soil vapor extraction via passive venting, liquid phase extraction.</p>		<input checked="" type="checkbox"/> Landfill cover/containment	<input type="checkbox"/> Monitored natural attenuation	<input checked="" type="checkbox"/> Access controls	<input type="checkbox"/> Groundwater containment	<input checked="" type="checkbox"/> Institutional controls	<input type="checkbox"/> Vertical barrier walls	<input type="checkbox"/> Groundwater pump and treatment		<input type="checkbox"/> Surface water collection and treatment		<input checked="" type="checkbox"/> Other: <i>e.g. Groundwater monitoring</i>	
<input checked="" type="checkbox"/> Landfill cover/containment	<input type="checkbox"/> Monitored natural attenuation												
<input checked="" type="checkbox"/> Access controls	<input type="checkbox"/> Groundwater containment												
<input checked="" type="checkbox"/> Institutional controls	<input type="checkbox"/> Vertical barrier walls												
<input type="checkbox"/> Groundwater pump and treatment													
<input type="checkbox"/> Surface water collection and treatment													
<input checked="" type="checkbox"/> Other: <i>e.g. Groundwater monitoring</i>													
Attachments: <input checked="" type="checkbox"/> Inspection team roster attached <input type="checkbox"/> Site map attached													
II. INTERVIEWS (Check all that apply)													
1. O&M site manager Michael Skinner <u>project manager</u> <u>23 Jan 2014</u> Name Title Date Interviewed <input checked="" type="checkbox"/> at site <input checked="" type="checkbox"/> at office <input type="checkbox"/> by phone Phone no. _____ Problems, suggestions; <input type="checkbox"/> Report attached _____													
2. O&M staff Raudel Sanchez <u>Project coordinator</u> <u>23 Jan 2014</u> Name Title Date Interviewed <input checked="" type="checkbox"/> at site <input checked="" type="checkbox"/> at office <input type="checkbox"/> by phone Phone no. _____ Problems, suggestions; <input type="checkbox"/> Report attached <u>Interviewed together with Mike Skinner</u>													

3.	Local regulatory authorities and response agencies (i.e., State and Tribal offices, emergency response office, police department, office of public health or environmental health, zoning office, recorder of deeds, or other city and county offices, etc.) Fill in all that apply.
<div style="margin-bottom: 10px;"> Agency _____ Contact _____ <div style="display: flex; justify-content: space-between; margin-top: 5px;"> Name Title Date Phone no. </div> </div> <div style="margin-bottom: 10px;"> Problems; suggestions; <input type="checkbox"/> Report attached _____ </div>	
<div style="margin-bottom: 10px;"> Agency _____ Contact _____ <div style="display: flex; justify-content: space-between; margin-top: 5px;"> Name Title Date Phone no. </div> </div> <div style="margin-bottom: 10px;"> Problems; suggestions; <input type="checkbox"/> Report attached _____ </div>	
<div style="margin-bottom: 10px;"> Agency _____ Contact _____ <div style="display: flex; justify-content: space-between; margin-top: 5px;"> Name Title Date Phone no. </div> </div> <div style="margin-bottom: 10px;"> Problems; suggestions; <input type="checkbox"/> Report attached _____ </div>	
<div style="margin-bottom: 10px;"> Agency _____ Contact _____ <div style="display: flex; justify-content: space-between; margin-top: 5px;"> Name Title Date Phone no. </div> </div> <div style="margin-bottom: 10px;"> Problems; suggestions; <input type="checkbox"/> Report attached _____ </div>	
4. Other interviews (optional) <input type="checkbox"/> Report attached.	
III. ON-SITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)	
1.	O&M Documents <div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"> <input type="checkbox"/> O&M manual <input type="checkbox"/> As-built drawings <input type="checkbox"/> Maintenance logs Remarks </div> <div style="width: 33%;"> <input type="checkbox"/> Readily available <input type="checkbox"/> Readily available <input type="checkbox"/> Readily available </div> <div style="width: 33%;"> <input type="checkbox"/> Up to date <input type="checkbox"/> Up to date <input type="checkbox"/> Up to date </div> <div style="width: 33%;"> <input type="checkbox"/> N/A <input type="checkbox"/> N/A <input type="checkbox"/> N/A </div> </div>
2.	Site-Specific Health and Safety Plan <div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"> <input type="checkbox"/> Contingency plan/emergency response plan Remarks </div> <div style="width: 33%;"> <input type="checkbox"/> Readily available <input type="checkbox"/> Readily available </div> <div style="width: 33%;"> <input type="checkbox"/> Up to date <input type="checkbox"/> Up to date </div> <div style="width: 33%;"> <input type="checkbox"/> N/A <input type="checkbox"/> N/A </div> </div>

IV. O&M COSTS																																											
1.	O&M Organization <input type="checkbox"/> State in-house <input type="checkbox"/> Contractor for State <input type="checkbox"/> PRP in-house <input checked="" type="checkbox"/> Contractor for PRP <input type="checkbox"/> Federal Facility in-house <input type="checkbox"/> Contractor for Federal Facility <input type="checkbox"/> Other included as part of dalties																																										
2.	O&M Cost Records <input checked="" type="checkbox"/> Readily available <input checked="" type="checkbox"/> Up to date <input checked="" type="checkbox"/> Funding mechanism/agreement in place Original O&M cost estimate _____ <input type="checkbox"/> Breakdown attached <div style="text-align: center;">Total annual cost by year for review period if available</div> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">From 2009</td> <td style="width: 20%;">To 2014</td> <td style="width: 20%;">~\$500,000/year</td> <td style="width: 40%;"><input type="checkbox"/> Breakdown attached</td> </tr> <tr> <td style="text-align: center;">Date</td> <td style="text-align: center;">Date</td> <td style="text-align: center;">Total cost</td> <td></td> </tr> <tr> <td>From</td> <td>To</td> <td></td> <td><input type="checkbox"/> Breakdown attached</td> </tr> <tr> <td style="text-align: center;">Date</td> <td style="text-align: center;">Date</td> <td style="text-align: center;">Total cost</td> <td></td> </tr> <tr> <td>From</td> <td>To</td> <td></td> <td><input type="checkbox"/> Breakdown attached</td> </tr> <tr> <td style="text-align: center;">Date</td> <td style="text-align: center;">Date</td> <td style="text-align: center;">Total cost</td> <td></td> </tr> <tr> <td>From</td> <td>To</td> <td></td> <td><input type="checkbox"/> Breakdown attached</td> </tr> <tr> <td style="text-align: center;">Date</td> <td style="text-align: center;">Date</td> <td style="text-align: center;">Total cost</td> <td></td> </tr> <tr> <td>From</td> <td>To</td> <td></td> <td><input type="checkbox"/> Breakdown attached</td> </tr> <tr> <td style="text-align: center;">Date</td> <td style="text-align: center;">Date</td> <td style="text-align: center;">Total cost</td> <td></td> </tr> </table>			From 2009	To 2014	~\$500,000/year	<input type="checkbox"/> Breakdown attached	Date	Date	Total cost		From	To		<input type="checkbox"/> Breakdown attached	Date	Date	Total cost		From	To		<input type="checkbox"/> Breakdown attached	Date	Date	Total cost		From	To		<input type="checkbox"/> Breakdown attached	Date	Date	Total cost		From	To		<input type="checkbox"/> Breakdown attached	Date	Date	Total cost	
From 2009	To 2014	~\$500,000/year	<input type="checkbox"/> Breakdown attached																																								
Date	Date	Total cost																																									
From	To		<input type="checkbox"/> Breakdown attached																																								
Date	Date	Total cost																																									
From	To		<input type="checkbox"/> Breakdown attached																																								
Date	Date	Total cost																																									
From	To		<input type="checkbox"/> Breakdown attached																																								
Date	Date	Total cost																																									
From	To		<input type="checkbox"/> Breakdown attached																																								
Date	Date	Total cost																																									
3.	Unanticipated or Unusually High O&M Costs During Review Period Describe costs and reasons: none																																										
V. ACCESS AND INSTITUTIONAL CONTROLS <input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A																																											
A. Fencing																																											
1.	Fencing damaged <input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> Gates secured <input type="checkbox"/> N/A Remarks																																										
B. Other Access Restrictions																																											
1.	Signs and other security measures <input type="checkbox"/> Location shown on site map <input type="checkbox"/> N/A Remarks																																										

C. Institutional Controls (ICs)			
1.	Implementation and enforcement Site conditions imply ICs not properly implemented <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A Site conditions imply ICs not being fully enforced <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A Type of monitoring (e.g., self-reporting, drive by) _____ Frequency _____ Responsible party/agency _____ Contact _____ Name Title Date Phone no. Reporting is up-to-date <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Reports are verified by the lead agency <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Specific requirements in deed or decision documents have been met <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Violations have been reported <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Other problems or suggestions: <input type="checkbox"/> Report attached		
2.	Adequacy	<input checked="" type="checkbox"/> ICs are adequate	<input type="checkbox"/> ICs are inadequate <input type="checkbox"/> N/A
Remarks			
D. General			
1.	Vandalism/trespassing	<input type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> No vandalism evident
Remarks			
2.	Land use changes on site	<input type="checkbox"/> N/A	
Remarks Yes- Proposed re-development.			
3.	Land use changes off site	<input checked="" type="checkbox"/> N/A	
Remarks			
VI. GENERAL SITE CONDITIONS			
A. Roads <input type="checkbox"/> Applicable <input checked="" type="checkbox"/> N/A			
1.	Roads damaged	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Roads adequate <input type="checkbox"/> N/A
Remarks			

B. Other Site Conditions	
Remarks	
<p align="center">VII. LANDFILL COVERS <input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A</p>	
A. Landfill Surface	
1.	Settlement (Low spots) <input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> Settlement not evident Areal extent _____ Depth _____ Remarks
2.	Cracks <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Cracking not evident Lengths _____ Widths _____ Depths _____ Remarks Cracks in surrounding foundations monitored annually and repaired immediately.
3.	Erosion <input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> Erosion not evident Areal extent _____ Depth _____ Remarks
4.	Holes <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Holes not evident Areal extent _____ Depth _____ Remarks Gophers dig in softer perimeter dirt, not in cap. Treated monthly.
5.	Vegetative Cover <input type="checkbox"/> Grass <input checked="" type="checkbox"/> Cover properly established <input checked="" type="checkbox"/> No signs of stress <input type="checkbox"/> Trees/Shrubs (indicate size and locations on a diagram) Remarks No trees were seen- palm trees are removed immediately when seen.
6.	Alternative Cover (armored rock, concrete, etc.) <input type="checkbox"/> N/A Remarks
7.	Bulges <input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> Bulges not evident Areal extent _____ Height _____ Remarks

8.	Wet Areas/Water Damage <input type="checkbox"/> Wet areas <input type="checkbox"/> Ponding <input type="checkbox"/> Seeps <input type="checkbox"/> Soft subgrade Remarks _____	<input checked="" type="checkbox"/> Wet areas/water damage not evident <input type="checkbox"/> Location shown on site map Areal extent _____ <input type="checkbox"/> Location shown on site map Areal extent _____ <input type="checkbox"/> Location shown on site map Areal extent _____ <input type="checkbox"/> Location shown on site map Areal extent _____
Remarks: included as part of dalies		
9.	Slope Instability Areal extent _____ Remarks _____	<input type="checkbox"/> Slides <input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> No evidence of slope instability
B. Benches <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Applicable (Horizontally constructed mounds of earth placed across a steep landfill side slope to interrupt the slope in order to slow down the velocity of surface runoff and intercept and convey the runoff to a lined channel.)		
1.	Flows Bypass Bench Remarks _____	<input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> N/A or okay
2.	Bench Breached Remarks _____	<input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> N/A or okay
3.	Bench Overtopped Remarks _____	<input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> N/A or okay
C. Letdown Channels <input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A (Channel lined with erosion control mats, riprap, grout bags, or gabions that descend down the steep side slope of the cover and will allow the runoff water collected by the benches to move off of the landfill cover without creating erosion gullies.)		
1.	Settlement Areal extent _____ Depth _____ Remarks _____	<input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> No evidence of settlement
2.	Material Degradation Material type _____ Areal extent _____ Remarks _____	<input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> No evidence of degradation
3.	Erosion Areal extent _____ Depth _____ Remarks _____	<input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> No evidence of erosion

4.	Undercutting Areal extent _____ Depth _____ Remarks _____	<input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> No evidence of undercutting
5.	Obstructions Type _____ <input checked="" type="checkbox"/> No obstructions <input type="checkbox"/> Location shown on site map Areal extent _____ Size _____ Remarks _____	
6.	Excessive Vegetative Growth Type _____ <input checked="" type="checkbox"/> No evidence of excessive growth <input type="checkbox"/> Vegetation in channels does not obstruct flow <input type="checkbox"/> Location shown on site map Areal extent _____ Remarks _____	
D. Cover Penetrations <input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A		
1.	Gas Vents <input type="checkbox"/> N/A <input type="checkbox"/> Active <input checked="" type="checkbox"/> Passive <input checked="" type="checkbox"/> Properly secured/locked <input checked="" type="checkbox"/> Functioning <input type="checkbox"/> Routinely sampled <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Evidence of leakage at penetration Remarks _____	
2.	Gas Monitoring Probes <input checked="" type="checkbox"/> Properly secured/locked <input checked="" type="checkbox"/> Functioning <input checked="" type="checkbox"/> Routinely sampled <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Evidence of leakage at penetration <input type="checkbox"/> Needs Maintenance <input type="checkbox"/> N/A Remarks _____	
3.	Monitoring Wells (within surface area of landfill) <input checked="" type="checkbox"/> Properly secured/locked <input checked="" type="checkbox"/> Functioning <input checked="" type="checkbox"/> Routinely sampled <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Evidence of leakage at penetration <input type="checkbox"/> Needs Maintenance <input type="checkbox"/> N/A Remarks _____	
4.	Leachate Extraction Wells <input checked="" type="checkbox"/> Properly secured/locked <input checked="" type="checkbox"/> Functioning <input checked="" type="checkbox"/> Routinely sampled <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Evidence of leakage at penetration <input type="checkbox"/> Needs Maintenance <input type="checkbox"/> N/A Remarks _____	
5.	Settlement Monuments <input type="checkbox"/> Located <input checked="" type="checkbox"/> Routinely surveyed <input type="checkbox"/> N/A Remarks _____	

E. Gas Collection and Treatment		<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
1.	Gas Treatment Facilities <input type="checkbox"/> Flaring <input type="checkbox"/> Thermal destruction <input type="checkbox"/> Collection for reuse <input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks Treatment shut down in 2008, passive venting now.		
2.	Gas Collection Wells, Manifolds and Piping <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks		
3.	Gas Monitoring Facilities (e.g., gas monitoring of adjacent homes or buildings) <input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance <input checked="" type="checkbox"/> N/A Remarks		
F. Cover Drainage Layer		<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
1.	Outlet Pipes Inspected <input checked="" type="checkbox"/> Functioning <input type="checkbox"/> N/A Remarks cleaned out about 2x year.		
2.	Outlet Rock Inspected <input type="checkbox"/> Functioning <input checked="" type="checkbox"/> N/A Remarks		
G. Detention/Sedimentation Ponds		<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
1.	Siltation <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Siltation not evident Areal extent _____ Depth _____ Remarks		
2.	Erosion Areal extent _____ Depth _____ <input checked="" type="checkbox"/> Erosion not evident Remarks		
3.	Outlet Works <input checked="" type="checkbox"/> Functioning <input type="checkbox"/> N/A Remarks		
4.	Dam <input checked="" type="checkbox"/> Functioning <input type="checkbox"/> N/A Remarks		

H. Retaining Walls		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	Deformations Horizontal displacement _____ Rotational displacement _____ Remarks _____	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Deformation not evident
2.	Degradation Remarks _____	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Degradation not evident
I. Perimeter Ditches/Off-Site Discharge		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	Siltation Areal extent _____ Depth _____ Remarks _____	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Siltation not evident
2.	Vegetative Growth Areal extent _____ Remarks _____	<input type="checkbox"/> Location shown on site map <input type="checkbox"/> Vegetation does not impede flow Type _____	<input type="checkbox"/> N/A
3.	Erosion Areal extent _____ Depth _____ Remarks _____	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Erosion not evident
4.	Discharge Structure Remarks _____	<input type="checkbox"/> Functioning	<input type="checkbox"/> N/A
VIII. VERTICAL BARRIER WALLS		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	Settlement Areal extent _____ Depth _____ Remarks _____	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Settlement not evident
2.	Performance Monitoring Type of monitoring _____ <input type="checkbox"/> Performance not monitored Frequency _____ Remarks _____	<input type="checkbox"/> Evidence of breaching Head differential _____	
IX. GROUNDWATER/SURFACE WATER REMEDIES		<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
A. Groundwater Extraction Wells, Pumps, and Pipelines		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	Pumps, Wellhead Plumbing, and Electrical <input type="checkbox"/> Good condition Remarks _____	<input type="checkbox"/> All required wells properly operating G Needs Maintenance G N/A	

2.	Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances <input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks
3.	Spare Parts and Equipment <input type="checkbox"/> Readily available <input type="checkbox"/> Good condition <input type="checkbox"/> Requires upgrade <input type="checkbox"/> Needs to be provided Remarks
B. Surface Water Collection Structures, Pumps, and Pipelines <input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A	
1.	Collection Structures, Pumps, and Electrical <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks
2.	Surface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks
3.	Spare Parts and Equipment <input type="checkbox"/> Readily available <input type="checkbox"/> Good condition <input type="checkbox"/> Requires upgrade <input type="checkbox"/> Needs to be provided Remarks N/A
C. Treatment System <input type="checkbox"/> Applicable <input checked="" type="checkbox"/> N/A	
1.	Treatment Train (Check components that apply) <input type="checkbox"/> Metals removal <input type="checkbox"/> Oil/water separation <input type="checkbox"/> Bioremediation <input type="checkbox"/> Air stripping <input type="checkbox"/> Carbon adsorbers <input type="checkbox"/> Filters _____ <input type="checkbox"/> Additive (e.g., chelation agent, flocculent) _____ <input type="checkbox"/> Others _____ <input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance <input type="checkbox"/> Sampling ports properly marked and functional <input type="checkbox"/> Sampling/maintenance log displayed and up to date <input type="checkbox"/> Equipment properly identified <input type="checkbox"/> Quantity of groundwater treated annually _____ <input type="checkbox"/> Quantity of surface water treated annually _____ Remarks Treatment shut down 2008
2.	Electrical Enclosures and Panels (properly rated and functional) <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks

3.	Tanks, Vaults, Storage Vessels <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Good condition <input type="checkbox"/> Proper secondary containment <input type="checkbox"/> Needs Maintenance Remarks
4.	Discharge Structure and Appurtenances <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks
5.	Treatment Building(s) <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Good condition (esp. roof and doorways) <input type="checkbox"/> Needs repair <input type="checkbox"/> Chemicals and equipment properly stored Remarks
6.	Monitoring Wells (pump and treatment remedy) <input type="checkbox"/> Properly secured/locked <input type="checkbox"/> Functioning <input type="checkbox"/> Routinely sampled <input type="checkbox"/> Good condition <input type="checkbox"/> All required wells located <input type="checkbox"/> Needs Maintenance <input checked="" type="checkbox"/> N/A Remarks
D. Monitoring Data	
1.	Monitoring Data <input checked="" type="checkbox"/> Is routinely submitted on time <input checked="" type="checkbox"/> Is of acceptable quality
2.	Monitoring data suggests: <input type="checkbox"/> Groundwater plume is effectively contained <input checked="" type="checkbox"/> Contaminant concentrations are declining
D. Monitored Natural Attenuation	
1.	Monitoring Wells (natural attenuation remedy) <input type="checkbox"/> Properly secured/locked <input type="checkbox"/> Functioning <input type="checkbox"/> Routinely sampled <input type="checkbox"/> Good condition <input type="checkbox"/> All required wells located <input type="checkbox"/> Needs Maintenance <input checked="" type="checkbox"/> N/A Remarks
X. OTHER REMEDIES	
If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the physical nature and condition of any facility associated with the remedy. An example would be soil vapor extraction.	

XI. OVERALL OBSERVATIONS	
A.	Implementation of the Remedy
	<p>Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.).</p> <p>The remedy includes an RCRA C equivalent cap, with passive gas venting and liquid phase extraction. The remedy is performing, and currently in the O&M phase, functioning as designed.</p>
B.	Adequacy of O&M
	<p>Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.</p> <p>No issues observed.</p>
C.	Early Indicators of Potential Remedy Problems
	<p>Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs, that suggest that the protectiveness of the remedy may be compromised in the future.</p> <p>No issues observed.</p>
D.	Opportunities for Optimization
	<p>Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.</p> <p>No Opportunities for optimization observed.</p>

Appendix E: Photographs from Site Inspection Visit

[This page is intentionally blank]

Photographs from Site Inspection Visit



Example of a sealed crack in one the buildings surrounding the landfill. Cracks in other buildings are sealed in the same manner.



Example of a vapor well, in this case, Vapor Well-39, in the north corner of the site, in Parcel 7. Note flush mount and surrounding shallow surface cracking in asphalt. The shallow cracks have no effect on protectiveness or on the physical integrity of the well itself.



Another example of an in-building sealed crack. Note new crack next to sealed crack, which will require sealing in the near future.



Vent pipe for Gas Collection, Venting, and Treatment System. The system currently operates in passive mode.



Inside liquid collection system.



Example of activated carbon filters for landfill reservoir area Gas Collection, Venting, and Treatment System. Note vent pipe behind the filter canisters.



Collection tank for holding liquid collected from one of the Leachate Collection wells, prior to transfer and off-site disposal.

[This page is intentionally blank]

Appendix F: Institutional Control Technical Memorandum

[This page is intentionally blank]

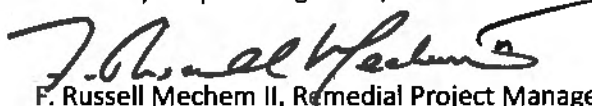


**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
75 Hawthorne Street
San Francisco, CA 94105-3901**

April 2, 2014

SUBJECT: Five Year Review, Institutional Controls (ICs), Waste Disposal Inc. (WDI)
Superfund Site, Santa Fe Springs, California.

TO: Miriam Gilmer, Project Manager
U.S. Army Corps of Engineers, Seattle District

FROM: 
F. Russell Mechem II, Remedial Project Manager (RPM)
EPA Region 9, SFD-8-2 (Ph: 415.972.3192)

This technical memorandum provides supporting documentation for the second Five-Year Review for the Waste Disposal, Inc., Superfund Site, located in Santa Fe Springs, California. EPA's selected remedy for the 38-acre site includes significant use of institutional controls (ICs) consistent with an Amended Record of Decision (Amended ROD or AROD) issued in June 2002. This tech memo addresses portions of the 2nd Five Year Review related to the ICs component.

1. Amended ROD Requirements

The WDI Superfund Site encompasses 38 acres with 22 separate land parcels and over 40 small businesses. The selected remedy is a landfill-type containment remedy that includes RCRA-equivalent capping, leachate and landfill gas control, long term operations and maintenance (O&M), and long term monitoring of landfill gas, indoor air, and groundwater. EPA's selected remedy also includes a significant ICs component that uses Land Use Controls (LUCs) in the form of Environmental Restriction Covenants (ERCs or covenants) for each parcel. The ERCs, which have been recorded for each parcel, provide notifications to prospective purchasers about the status and condition of the site and place numerous restrictions on land and water uses. The ERCs also prohibit residential land use and require EPA's review and prior written approval for an extensive list of activities that could potentially damage the engineered capping and monitoring systems.

Each of the ERCs has been made by and between the parcel owners (Owners) and the WDI Site Trust and function to restrict the use of the property to protect human health, safety, and the environment. Each ERC includes an explicit statement of the parties' intent that the covenant be for the benefit of USEPA and the California DTSC as third-party beneficiaries.

The ERCs all include summaries of the facts, definitions, general provisions, and a list of specific restrictions. The land use restrictions run with land; are binding upon owners and

occupants (e.g., tenants); include notifications of hazardous substances; and must be incorporated in to deeds, leases and conveyances of property (e.g., sales).

The ERCs also include extensive land use restrictions (Prohibited Uses) intended to prevent human exposure to harmful waste materials and protect the integrity of the completed remedy. The ERCs require Owners to maintain any necessary engineered capping systems and engineering controls for any new structures or building that may require city building permit, as specified by EPA. Owners may not use, or allow others to use, the property in a manner that may interfere with or adversely affect the implementation, integrity, or protectiveness of response actions required by EPA for the selected remedy.

2. Prohibited Uses (See ERCs Article 4.02):

Each ERC includes the land use restrictions identified below, which are copied verbatim from the AROD.

The land use restrictions in the restrictive covenants shall include compliance by all users of the properties with the following restrictions:

1. *Placement of warning signs or other posted information shall be allowed and, once posted, no removal or interference with such signs or information shall be permitted.*
2. *Placement of site access controls, such as gates or fencing, shall be allowed and shall not be damaged or circumvented.*
3. *The site or such other property shall not be used in any manner that may interfere with or affect the integrity of the remedial cap or other components of the remedy, as constructed pursuant to this Amended ROD.*
4. *Construction not approved by EPA that impacts any of the remedial capping or other remedy components shall not occur.*
5. *No interference with or alterations to the grading, vegetation and surface water and drainage controls shall be made without the prior written approval of EPA.*
6. *Portions of the site or such other adjacent property underlain by waste materials or in soil gas noncompliance areas shall not be regraded without the prior written approval of EPA.*
7. *Areas of asphalt or concrete pavement shall not be removed or improved without the prior written approval of EPA.*
8. *No penetrations or interferences (including, but not limited to, utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, and foundation piles) within the remedial cap or any other areas with remedial controls shall occur without the prior written approval of EPA.*
9. *Deep-rooting plants (plants whose root systems will penetrate more than two feet below ground surface) shall not be planted without the prior written approval of EPA.*
10. *Approval from EPA must be obtained for settings of irrigation controls. Such settings shall not be changed without the prior written approval of EPA.*
11. *Drainage channels and pipes shall not be blocked, rerouted or otherwise interfered with without the prior written approval of the EPA.*

12. *No new openings shall be made in building floor slabs in buildings located over waste materials or over soil gas noncompliance areas without the prior written approval of EPA.*
13. *The integrity of existing and future foundations shall be maintained in areas underlain by waste materials or in soil gas noncompliance areas. All cracks or damage in such foundations shall be reported to EPA and DTSC.*
14. *Indoor gas controls shall not be circumvented.*
15. *Indoor gas sensors or alarms shall not be turned off or interfered with.*
16. *Soil gas control systems shall not be turned off or interfered with.*
17. *Monitoring points, including but not limited to groundwater monitoring wells, soil gas probes, reservoir (in Area 2) leachate collection wells, soil gas vents, and survey monuments, shall not be blocked or otherwise obstructed.*
18. *Monitoring wells shall not be opened; nothing shall be placed into the monitoring wells except by authorized personnel permitted to monitor the wells.*
19. *Liquids recovery systems, liquids treatment systems, and treated liquids storage facilities shall not be turned off or interfered with.*
20. *Groundwater supply or monitoring wells shall not be constructed without the prior written approval of EPA, and there shall be no extraction of or injection into groundwater on the site.*
21. *Owners of the site or any portion thereof shall disclose all institutional controls to all tenants on the property.*
22. *Owners of the site or any portion thereof shall inform EPA of the identities of all tenants on the property.*
23. *During construction, excavation, or grading of any type, measures shall be taken to ensure that there is no offsite migration of dust, odors or organic vapors. During such activities, appropriate measures shall be taken to protect the health and welfare of on-site personnel and workers and to prevent offsite impacts.*
24. *Prior written approval must be obtained from EPA for all building or site modifications.*
25. *Waste materials shall not be excavated without the prior written approval of and supervision by EPA.*
26. *No new construction shall occur on the site without the prior written approval of EPA.*
 - (a) New construction shall be supported by subsurface explorations and analytical laboratory data to characterize the construction area for the possible existence of waste materials.*
 - (b) If contaminants are discovered in the construction area, they shall be remediated or buildings and structures must be appropriately designed to protect occupants.*
 - (c) Appropriate worker and public health and safety precautions, including but not limited to dust control, safety plans, and other forms of worker protection, must be taken prior to approval of construction.*
27. *Boreholes, foundation piles, or other subsurface penetrations into the reservoir (in Area 2) or any other area of the site which could create conduits allowing wastes to migrate to groundwater shall not be made without the prior written approval of EPA.*
28. *Construction workers shall be provided with appropriate personal protective equipment while they are working at the site.*
29. *Pesticides or herbicides shall not be applied to the capped areas of the site or to areas surrounding monitoring points without the prior written approval of EPA.*

30. *Use of any septic tanks on the property shall be discontinued and such tanks shall be decommissioned in accordance with local regulations.*
31. *The site or such other property shall not be used or redeveloped for residential use; use as a hospital, school for people aged 21 and under, or day care center; or other uses by sensitive receptors.*

3. Mechanisms for Implementing ICs:

As of December 2007, EPA had entered into 14 separate consent decrees with the various landowners of parcels contained within the WDI site; each consent decree covers one or two parcels. The consent decrees address (1) access, (2) institutional controls, and (3) financial settlements in the case of those few some landowners with independent liability for historical operations at the WDI site. The consent decrees require the landowner(s) to record an Environmental Restriction Covenant for the relevant parcel(s). All of the covenants have been recorded and are publicly available at the LA County Recorder's Office.

ICs are intended to run with the land and remain in effect through changes in title or property status. As an example, a financial institution foreclosed on an old promissory note against one of the parcels (Parcel 49) in 2007, thus extinguishing the recorded ERC. Under California law, foreclosure of a lien extinguishes covenants recorded later in time. A new ERC therefore had to be recorded on this parcel on March 18, 2009.

The ERCs require each landowner to notify EPA of any proposed changes to structures or the property that might impact the remedy, and to notify tenants about the restrictions.

a. Institutional Controls Monitoring and Enforcement Work Plan (ICMEWP)

In 2004, EPA and the Waste Disposal Inc. Group (WDIG) entered into a consent decree, pursuant to which the WDIG implemented the remedy selected in the AROD. Among other elements, the WDIG Consent Decree required the development, and regular updating, of an Institutional Controls Monitoring and Enforcement Work Plan (ICMEWP). The "evergreen" ICMEWP, last revised in May 2008, describes WDIG's procedures for monitoring and enforcing the selected ICs. The approach outlined in the ICMEWP has been generally effective, and WDIG has been upgrading its procedures. EPA recommends that the WDIG update the ICMEWP (see Recommendations, below) to more accurately reflect some of the current details of the ICs monitoring program.

The WDIG implements the monitoring and enforcement of ICs through a combination of approaches and mechanisms, including (1) physical inspections, (2) review of physical records, and (3) electronic or digital internet-based searches and record reviews. WDIG uses its project management and engineering contractor to conduct physical inspections of all site parcels on a quarterly basis. WDIG's contractor uses detailed parcel-specific checklists to identify and track key aspects of each parcel that require regular inspection. WDIG also contracts with a specialty information technology firm, Terradex of Palo Alto, California, to coordinate digital monitoring of ICs, including searches of databases which provide information on land activities.

b. Quarterly Inspections (OM&M and ICs Monitoring):

As part of long term operations, maintenance, and monitoring (OM&M), WDIG performs formal inspections of the entire site on a quarterly basis. The purpose is to ensure the integrity and protectiveness of the remedy including both (1) engineering controls and (2) institutional controls. Inspections address outdoor aspects of the parcels and, in some cases, limited indoor inspections during indoor air sampling events.

WDIG has developed detailed, parcel-specific inspection plans and checklists to ensure thorough inspection of engineering and institutional controls for each parcel. The inspections are critical to ensuring the long term physical integrity of the site's RCRA-equivalent engineered capping system along with stormwater, leachate, soil gas, and groundwater management and monitoring systems. WDIG conducts indoor inspections for four parcels as part of the indoor air monitoring program. The inspections are also important for monitoring ICs. The inspections and checklists explicitly address each of the Prohibited Uses with the exception of #21 and #22 that relate to parcel owners, and require the inspectors to verify that engineered systems are functioning effectively and that no work or restricted activities have been conducted without EPAs approval.

c. Digital & Physical Review of Records:

Digital/Electronic Land Activity Reviews: WDIG and their contractors electronically review building permits, land use, construction, financial, and title records on an ongoing basis to monitor potential changes in land use, title, or upcoming construction. WDIG contracts with Terradex to monitor electronic databases, web sites, and information clearing houses to detect potential construction, development, signs of financial distress, and changes in title status. Terradex maintains subscriptions with data clearing houses that provide advance notification about activities that could impact ICs. Table 1 below summarizes the most significant databases that Terradex monitors on a regular and ongoing basis.

Database/Records Repository	Objective/Focus	Frequency
USA South (aka Dig-Alert)	Excavation	2 x daily
Zillow™	Sales, foreclosures	Daily
CoStar™	Sales, foreclosures	Daily
Construction Monitor™	Building permits	Weekly
City of SFS Website	Zoning, development opportunities, land use	Monthly
McGraw Hill™	Major construction projects	Monthly
ParcelQuest™	Owner change/conveyance/subdivision	Monthly
InfoUSA™	Sensitive Uses	Bi-monthly
Cal. Community Care Licensing Div. (CCCLD)	Sensitive Uses	Bi-monthly
County Records (File Reviews)	Documentation of title records, ERCs,	-----
Preliminary Title Reports (PTRs)	Documentation of title records, ERCs	-----

Table 1: Databases monitored by Terradex

The digital monitoring provides notifications to Terradex staff of “events”, which are potential changes in site status that might indicate unauthorized onsite construction (e.g., Dig-Alert™), pending permit changes, or changes in title status (e.g., Zillow™, Costar™, & ParcelQuest™). Terradex staff filter and review events internally and then issue event notifications to WDIG. Together they decide how to follow up to characterize an event. If further research indicates a potential impact with respect to the ERCs (e.g., unauthorized construction, potential sales, or foreclosures), Terradex issues an “alert” notice, and WDIG can take steps to intervene and/or enforce the ICs.

File Reviews: At present, WDIG relies on digital monitoring to detect potential changes in land activity status based on notification of events and alerts. The WDIG also has the capability in terms of staff and expertise to conduct periodic file reviews of physical records located at the City of Santa Fe Springs and LA County Recorder’s Office. City records include land use, zoning, and permit records. The city web site highlights new development opportunities, current or pending construction and development projects, and potential land use changes. The LA County Recorder’s Office maintains the title records and the ERCs relevant to the WDI site.

To date, it appears that WDIG has not been conducting regular file reviews of physical site records at the city or county level. The last physical file reviews were conducted on September 10, 2008, at the Los Angeles County Assessor’s office (Monitoring Year 2012 WDI Annual OM&M Report, 5.17.2013, pg. 7-8) and December 2009 (email communication from Mike Skinner, WDIG, 3.19.2014). EPA recommends that WDIG commence periodic file reviews of physical records based on a schedule to be approved by EPA. Review of physical files can verify that ERCs remain in effect and can detect additional liens, encumbrances, or changes in status (e.g., foreclosures) that might nullify ERCs. EPA also recommends that WDIG initiate a process to obtain periodic Preliminary Title Reports (PTRs), according to a schedule subject to EPA approved, in order to formally verify the status of the ERCs.

d. Reporting and Verification of ICs

Annual OM&M Reports: The WDIG submits an Annual Operations, Maintenance, and Monitoring (OM&M) Report which includes the information about compliance with the Institutional Controls Program, as well as activities related to both engineering controls. Section 7 and a corresponding appendix of the OM&M reports specifically address ICs.

Inspections Reporting: According to annual OM&M reports, WDIG conducts formal inspections on a quarterly basis. WDIG conducts additional informal inspections each time a project team representative visits the site or specific parcels. The reports include completed Site Inspection Checklists for each parcel. A copy of one of the checklists is attached for reference.

Ownership/Occupancy: The annual OM&M reports also update the landowner and tenant list for the properties. The tenant list is verified by the site inspections. Terradex also reviews online property data on a monthly basis through ParcelQuest to verify property ownership. Over the past five years, there have been no changes in property

ownership. There have been several new tenants, however, as indicated in the parcel checklists.

Event/Alerts Reporting: The OM&M reports also summarize land activity monitoring conducted by Terradex. The reports include charts and/or tables that summarize events and alerts developed as a result of the Terradex internet-based monitoring program. So far, the approach has proved effective in maintaining effective tracking of site related ICs. EPA plans to continue to work with WDIG to develop an updated tracking system to track the entire life cycle for events, alerts, and follow-up actions.

4. Review of ICMEWP and OM&M Reports:

As part of this Five Year Review, EPA has conducted reviews of the most recent ICMEWP and OM&M reports to assess WDIG's implementation of the institutional controls required by the AROD and consent decree with EPA. In addition, EPA has conducted interviews with WDIG representatives to follow-up on specific details of the monitoring practices. In particular, EPA conducted an interview with WDIG and Terradex representatives on March 4, 2014, in which Terradex described the detailed procedures of its records reviews and internet-based data base searches and monitoring programs. EPA will continue to work with WDIG and Terradex on the digital ICs monitoring program, and plans to make some recommendations concerning future use of both formal and informal records reviews.

EPA will request that WDIG conduct informal file reviews of city and county records part at least every 12 months months to confirm that ERCs remain effective for all site parcels. In addition, EPA will request WDIG to submit Preliminary Title Reports (PTRs) for all parcels, or a representative subset as approved by EPA, every five (5) years, or based on an alternative schedule if approved by EPA. The PTRs should be submitted prior to EPA's Five Year Review to confirm title status. EPA seeks to use the PTRs to demonstrate the exact results that would be obtained by a private party seeking information about the site.

5. Findings & Conclusions:

Based on its review of the ICMEWP, the annual OM&M reports, and the results of inspections and interviews, EPA has concluded that the WDIG's ICs program has been effective. WDIG, with assistance from specialty contractors, performs activities which, either individually or in combination, ensure the monitoring and enforcement of ICs required by the AROD and Consent Decree in a manner which is protective.

The attached table provides a two-part summary of (1) the WDIG/Terradex land activity monitoring procedures and (2) specific land use restrictions from the ERCs, and WDIG's procedures for monitoring them.

6. Issues:

There are no issues that affect remedy protectiveness or that need formal resolution through the Five Year Review Process.

7. Recommendations for Follow-Up:

EPA is providing several recommendations for follow-up action by WDIG as part of the normal OM&M process. The recommendations primarily focus on providing additional documentation as part of the normal ICs planning process (through the ICMEWP) and annual reporting process (through the OM&M reports). These recommendations do not impact remedy protectiveness or rise to the level requiring formal Five Year Review tracking or resolution. EPA has discussed the recommendations with WDIG and anticipates that the recommendations can be implemented readily as part of the standard evergreen updating process for the ICMEWP and OM&M reports that will occur in the near future.

- a. **ICMEWP Updates:** Consistent with the evergreen approach outlined in the Statement of Work for the WDIG Consent Decree, WDIG should update the ICMEWP to provide current information regarding the program for monitoring ICs. EPA will coordinate with WDIG regarding the specific revisions. Generally, the updated ICMEWP should provide additional detail concerning the objectives and detailed methodology for ICs monitoring in terms of (a) file reviews of physical records, (b) internet-based records searches and database monitoring, and (c) physical inspections. This process should include, in addition to other activities, additional procedures to conduct records reviews and title searches to formally verify the status of land use covenants. EPA will coordinate with WDIG to include physical reviews of County records (i.e., informal file reviews) every 12 months and PTRs for all parcels – or a representative subset of parcels as approved by EPA – every five (5) years, prior to the Five Year Reviews. The objective is to document that ERCs remain effective, are accessible, and are properly filed with other title documents for the parcels. EPA also will ask the WDIG to include more detailed procedures to document the tracking of the life cycle of “events” from initial event notification, filtering and escalation to “alert” status (if warranted), through intervention, and finally post-resolution closeout.
- b. **OM&M Report Revisions:** WDIG should revise and update the organization and content of the OM&M reports to provide additional detail regarding the monitoring and enforcement of ICs. Similar to requested updates for the ICMEWP, the reports should provide detail concerning the approach, methodology, and results of monitoring practices related to (a) review of physical records, (b) internet-based records searches and database monitoring and (c) physical inspections.

Attachments:

1. Parcel specific checklist
2. Sample ERC
3. WDIG/Terradex PowerPoint Deck (from March 4, 2014 interview w/ WDIG)
4. ICs Review Table
5. Figure 7-1 from OMM Report tracking Events and Alerts (Terradex)
6. Email from Mike Skinner, WDIG Project Coordinator, re. File Reviews

Appendix F
Institutional Control Technical Memorandum

Attachment 1
Parcel Specific Checklist

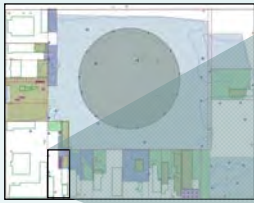
APPENDIX H:
INSTITUTIONAL CONTROL CHECKLIST AND PARCEL INFORMATION



Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan



Cover/Monitoring Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-003
 Owner: Raymond and Donnis Holbrook Trust
 Tenants: Metro Diesel Injection, DT Precision, D.K. Enterprises; Vacant Unit
 Area: 0.83 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A		
Remedy Integrity				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquid Recovery System				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Drainage				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	Yes		
Gas Controls				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain foundation footings	Yes		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	Yes		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

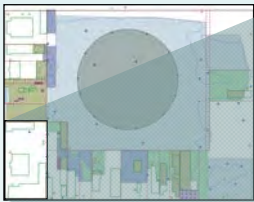
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



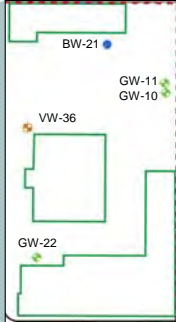
Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan

Cover/Monitoring
Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-004
 Owner: Dia-log Company
 Tenants: Air Liquide
 Area: 2.64 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	N/A		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	N/A		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	N/A		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	N/A		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	N/A		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	N/A		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas: report or repair cracks or damage.	Maintain foundation footings	N/A		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	N/A		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	Not applicable	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	Not applicable	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements: monitoring and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

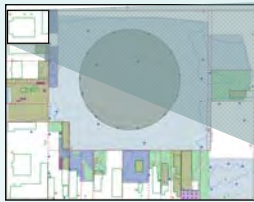
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



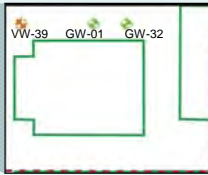
Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan



Cover/Monitoring Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-007
 Owner: Eugene and Geraldine Welter Trust
 Tenants: Ink Print, The Polish Shop, Cardon Cutting Tools, Fontenont Construction, Green Mountain Studios, Conrad Enterprises, City Steel, Go Fast, A & L Sweep Systems; 9 Vacant Units
 Area: 1.15 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	N/A		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	N/A		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	Maintain parcel drainage *Maintenance of vegetation (i.e. cutting/burning of grass, weeds, or other ground cover)	N/A		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	N/A		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	N/A		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	N/A		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas: report or repair cracks or damage.	Maintain foundation footings	N/A		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	N/A		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements: monitoring and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

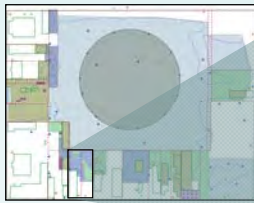
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan



Cover/Monitoring Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel Nos. APN 8167-002-011 and APN 8167-002-012
 Owner: Albert C.K. and Betty Leung
 Tenants: AAG Metal Industries
 Area: 0.47 Ac. and 0.5 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	Yes		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas; report or repair cracks or damage.	Maintain foundation footings	N/A		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	Yes		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring; and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

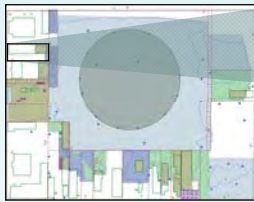
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan

Cover/Monitoring
Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-021
 Owner: Lucille F. Ferris Living Trust
 Tenants: Chilliers Services
 Area: 0.57 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	Yes		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas; report or repair cracks or damage.	Maintain foundation footings	Yes		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	Yes		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

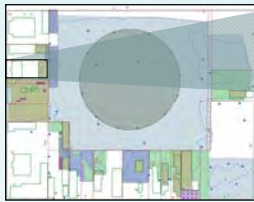
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan

Cover/Monitoring
Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-022
 Owner: John I. Maple Family Partnership
 Tenants: Gold Coast Refractory
 Area: 0.62 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	N/A		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	N/A		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas: report or repair cracks or damage.	Maintain foundation footings	N/A		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	N/A		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	N/A		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	N/A		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	N/A		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring; and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

* denotes new items that were added for ICMEWP Revision 1, November 28, 2005

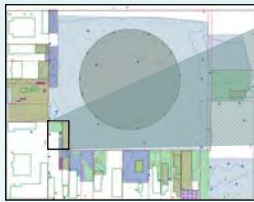
N/A - Not Applicable to this Parcel



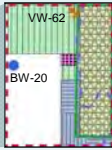
Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan



Cover/Monitoring Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-024
 Owner: Raymond and Donnis Holbrook Trust
 Tenants: Buffalo Bullet, C & E Metal Products, Inc.
 Area: 0.49 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	Yes		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas; report or repair cracks or damage.	Maintain foundation footings	Yes		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	Yes		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring; and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

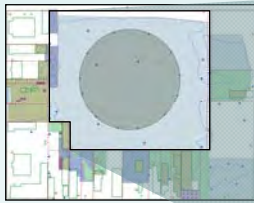
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



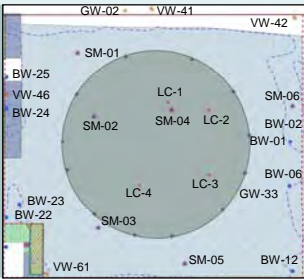
Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan

Cover/Monitoring
Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel Nos. APN 8167-002-025 and APN 8167-002-026
 Owner: Marvin W. Pitts and Cecelia Pitts (Pitts Family Trust); Adeline R. Bennet, M.D. Living Trust
 Tenants: Marvin W. Pitts (Reservoir Area)
 Area: 0.44 Ac. and 17.65 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)		Description of Violation	Remedial Action
Signage:					
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	25	26		
		N/A	Yes		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A	Yes		
Remedy Integrity:					
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	N/A	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes	Yes		
Vegetation:					
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes	Yes		
Liquids Recovery System:					
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A	Yes		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)		Description of Violation	Remedial Action
Drainage:					
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	Yes	Yes		
Gas Controls:					
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas; report or repair cracks or damage.	Maintain foundation footings	N/A	N/A		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	N/A	N/A		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A	N/A		
Monitoring Points:					
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A	Yes		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes	Yes		
Regulations:					
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring; and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes	Yes		

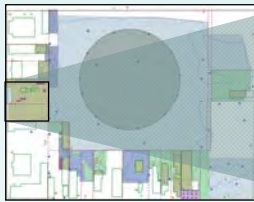
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



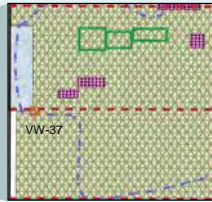
Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan



Cover/Monitoring Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel Nos. APN 8167-002-028 and APN 8167-002-029
 Owner: Thomas J. Mersits and Irene L. Mersits Trust
 Tenants: Mersits Equipment
 Area: 0.62 Ac. and 0.72 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)		Description of Violation	Remedial Action
Signage:					
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	28	29		
		N/A	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A	N/A		
Remedy Integrity:					
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes	Yes		
Vegetation:					
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes	Yes		
Liquids Recovery System:					
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A	N/A		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)		Description of Violation	Remedial Action
Drainage:					
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	N/A	N/A		
Gas Controls:					
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas; report or repair cracks or damage.	Maintain foundation footings	Yes	Yes		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	Yes	Yes		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A	N/A		
Monitoring Points:					
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes	Yes		
Regulations:					
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes	Yes		

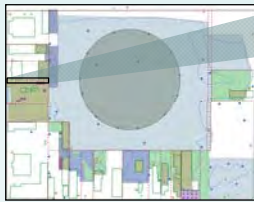
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan

Cover/Monitoring
Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel Nos. APN 8167-002-030
 Owner: Marvin W. Pitts and Cecelia Pitts (Pitts Family Trust); Adeline R. Bennet, M.D. Living Trust
 Tenants: Marvin W. Pitts (Driveway)
 Area: 0.14 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	Yes		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	Yes		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas; report or repair cracks or damage.	Maintain foundation footings	N/A		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	N/A		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	N/A		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	N/A		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	N/A		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring; and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

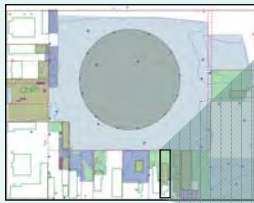
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



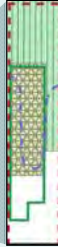
Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan



Cover/Monitoring Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-032
 Owner: David Joseph Neptune Family Trust
 Tenants: California Reamers
 Area: 0.39 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	Yes		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas: report or repair cracks or damage.	Maintain foundation footings	Yes		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	Yes		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	N/A		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	N/A		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	N/A		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

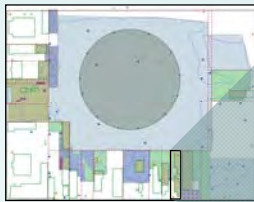
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan



Cover/Monitoring Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-037
 Owner: Lula Graziano, Trustee of Trust "A" of the Graziano Trust as restated March 4, 1992; Lula Graziano, Trustee of Trust "B" of the Graziano Trust as restated March 4, 1992; Jovita I. Ortega
 Tenants: Richard Stannard
 Area: 0.39 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	Yes		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas: report or repair cracks or damage.	Maintain foundation footings	Yes		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	Yes		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	N/A		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	N/A		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	N/A		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring; and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

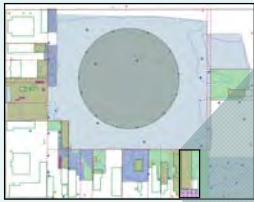
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan



Cover/Monitoring Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-041
 Owner: Eugene and Geraldine Welter Trust
 Tenants: Four C's Transmission, Seal Method, Inc., 25 Stage Enterprises, Seal Method, Inc., Storage, Leo's Lawnmower, Hernandez Auto, H & H Contractors
 Area: 0.78 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	Yes		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	Yes		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	Yes		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas: report or repair cracks or damage.	Maintain foundation footings	Yes		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	Yes		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring; and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

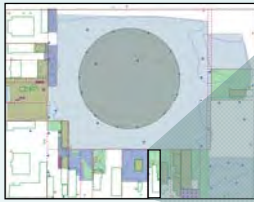
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan



Cover/Monitoring Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-042
 Owner: Danny R. Peoples and Dena Peoples
 Tenants: Airbrake Associates
 Area: 0.50 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	Yes		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas: report or repair cracks or damage.	Maintain foundation footings	Yes		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	Yes		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring; and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

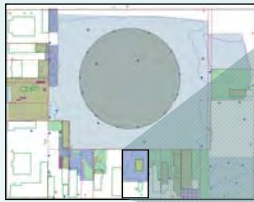
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



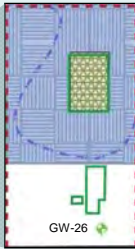
Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan



Cover/Monitoring Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-043
 Owner: Eddie Earl Timmons
 Tenants: Timmon's Wood Products and Crane Guys, LLC
 Area: 1.02 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	Yes		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas: report or repair cracks or damage.	Maintain foundation footings	Yes		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	Yes		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring; and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

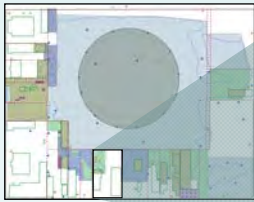
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



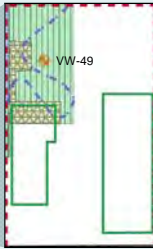
Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan



Cover/Monitoring Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-044
 Owner: Sisneros Family Trust
 Tenants: Sisneros Office Furniture
 Area: 1.17 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	Yes		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	Yes		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas: report or repair cracks or damage.	Maintain foundation footings	Yes		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	Yes		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring; and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

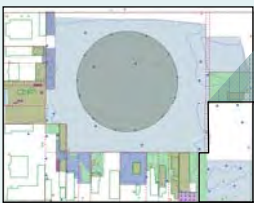
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



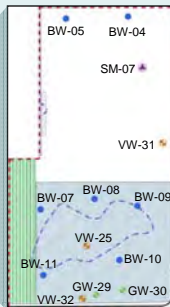
Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan

Cover/Monitoring
Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-049
 Owner: Greve Financial Services, Inc.
 Tenants: Vacant Lot
 Area: 3.87 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	Yes		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	N/A		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas: report or repair cracks or damage.	Maintain foundation footings	N/A		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	N/A		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	Yes		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

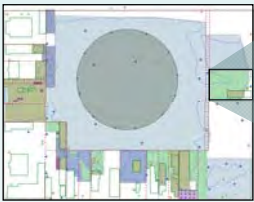
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



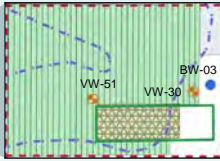
Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan



Cover/Monitoring Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-050
 Owner: Brothers Machine & Tool, Inc.
 Tenants: Brothers Machine & Tool
 Area: 1.09 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	N/A		
Remedy Integrity				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	Yes		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	Yes		
Gas Controls				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas: report or repair cracks or damage.	Maintain foundation footings	Yes		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	Yes		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	Not applicable	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	Not applicable	N/A		
Monitoring Points				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	Not applicable	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements: monitoring and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTS hazardous waste disposal requirements.		Yes		

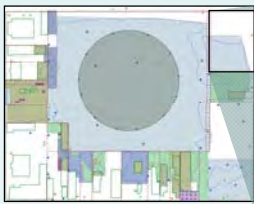
* denotes new items that were added for ICMEWP Revision 1, November 28, 2005
 N/A - Not Applicable to this Parcel



Aerial Key Plan



Parcel Detail



Cover/Monitoring Key Plan



Cover/Monitoring Parcel Detail

Legend

	RCRA Subtitle C-Equivalent Cap Area		Biovent Well
	RCRA Subtitle D-Equivalent Cover Area		Ground Water Well Retained for Monitoring
	Remove Existing Asphalt and Replace with Engineered Asphalt Cover		Vapor Well Retained for Monitoring
	2" Asphalt Overlay Cover		Leachate Collection Well
	Remove Existing Concrete and Replace with Engineered Concrete Cover		Settlement Monument
	Engineered Concrete Cover with Sealed Cracks		Clean Out
	Seal Asphalt And Restripe		Parcel Boundary
			Limits of Waste

Institutional Control Checklist and Parcel Information

Parcel No. APN 8167-002-051
 Owner: Marvin W. Pitts and Cecelia Pitts (Pitts Family Trust); Adeline R. Bennet, M.D. Living Trust
 Tenants: Vacant Lot
 Area: 2.15 Ac.

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Signage:				
Allow placement of warning signs or other posted site information and, once posted, do not remove or interfere with.	Maintain sign on back fence	N/A		
* Inspect EPA-approved signs and remove graffiti.	Maintain signs on perimeter of property	Yes		
Remedy Integrity:				
Allow placement of site access controls, e.g., gates or fencing, and do not damage or circumvent the remedy components.	Maintain back fence integrity	Yes		
Uses of the property, including new development, must not interfere with or affect the integrity of the cap and other remedy components.	Maintain paving	Yes		
*Construction that impacts the remedial capping or other remedy components shall require EPA approval.	- If waste is discovered, it shall be remediated and structures must be designed to protect occupants.	Yes		
No interferences with or alterations to the grading, vegetation and surface water & drainage should be made.	- Maintain parcel drainage - Maintenance of vegetation (i.e. cutting/trimming of grass, weeds, or other ground cover)	Yes		
Portions of the property underlain by buried wastes should not be re-graded.	Maintain soil cap	Yes		
Areas of asphalt or concrete pavement should not be removed or improved without the concurrence of the site custodian.	Maintain paving	N/A		
No penetrations (e.g., utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, foundation piles, etc.) or interferences with the cap or any other areas with remedial controls should be made.	No subsurface work	Yes		
*Waste materials shall not be excavated without EPA approval.	No excavation	Yes		
*Construction shall not occur without EPA approval.	No construction	Yes		
Vegetation:				
Deep-rooting plants (i.e., plants whose root systems will penetrate more than about 2 feet deep) should not be planted.	No new plantings	Yes		
*In areas underlain by waste, obtain EPA approval for changes to irrigation and controls.	No irrigation changes without approval	Yes		
*Pesticides or herbicides shall not be applied on capped areas of the site or areas around monitoring locations without EPA approval.	No pesticides without approval	Yes		
Liquids Recovery System:				
*Liquids recovery, treatment and storage system components shall not be turned off or interfered with.	Maintain systems	N/A		
Drainage:				
Drainage channels or pipes should not be blocked, rerouted or otherwise interfered with.	Maintain parcel drainage	N/A		

Site Control	Parcel Specific Requirements	In Compliance? (Yes/No)	Description of Violation	Remedial Action
Gas Controls:				
Maintain integrity of existing and future foundations in areas underlain by waste and in soil gas noncompliance areas: report or repair cracks or damage.	Maintain foundation footings	N/A		
For buildings located over buried wastes, or in soil gas noncompliance areas no new openings should be made in building floor slabs.	Maintain slab integrity	N/A		
Indoor gas controls should not be circumvented.	Maintain gas vent system	N/A		
Indoor gas sensors or alarms should not be turned off or interfered with.	N/A	N/A		
Soil gas control systems/alarms should not be turned off or interfered with.	N/A	N/A		
Monitoring Points:				
Monitoring points (e.g., ground water monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, survey monuments) should not be blocked or otherwise obstructed.	Clear access to all wells and vents	Yes		
*Clearly label and maintain stenciling for wells, biovent wells, and piezometers using appropriate large font stenciling.	Access allowed	Yes		
*Clearly label and maintain stenciling for settlement monuments using appropriate large font stenciling.	N/A	N/A		
Do not open or place anything into monitoring wells.	All wells and vents locked	Yes		
Ground water supply or monitoring wells should not be constructed.	No new wells	Yes		
Regulations:				
Allow property access, including access to existing and new buildings or structures, for inspections and monitoring for compliance with easements; monitoring; and installation, maintenance and operation of remedial measures, including signs and access controls.	Access allowed	Yes		
Comply with Waste Discharge regulations and DTSC hazardous waste disposal requirements.		Yes		

* denotes new items that were added for ICMEWP Revision 1, November 28, 2005

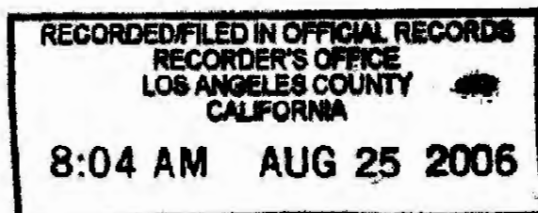
N/A - Not Applicable to this Parcel

Appendix F
Institutional Control Technical Memorandum

Attachment 2
Sample ERC

This page is part of your document - DO NOT DISCARD

06 . 1903512



TITLE(S) :



L E A D S H E E T

FEE

D.T.T.

FEE \$	103 WW
DAF \$	2
C-20	33

CODE
20


CODE
19

CODE
9

Assessor's Identification Number (AIN)

To be completed by Examiner OR Title Company in black ink.

Number of AIN's Shown

06-1903512 

RECORDING REQUESTED BY:

Gwen Campbell
c/o Christa Huddle
235 E. Blossom Place
Brea, CA 92821

WHEN RECORDED, MAIL TO:

Michael J. Skinner
Trustee of the WDIG Site Trust
Michael J. Skinner Consulting, LLC
230 Kings Highway East, #300
Haddonfield, NJ 08033

SPACE ABOVE THIS LINE RESERVED FOR RECORDER'S USE

COVENANT TO RESTRICT USE OF PROPERTY

ENVIRONMENTAL RESTRICTION

(Re: Assessor's Parcel No. 8167-002-049, 9951 S. Greenleaf Avenue, Santa Fe Springs, CA)

This Covenant and Agreement ("Covenant") is made by and between Diane Cote, Trustee of the Phil Campbell and Diane Cote Family Trust, and Gwen Campbell (the "Covenantors"), the current owners of property situated in Santa Fe Springs, County of Los Angeles, State of California, described in Exhibit A, attached hereto and incorporated herein by this reference (the "Property"), and the WDIG Site Trust ("WDIG Site Trust" or "Trust"). Pursuant to Civil Code section 1471(c), this Covenant is reasonably necessary to protect present or future human health or safety or the environment as a result of the presence on the land of hazardous substances as defined in 42 U.S.C. § 9601(14), pollutants or contaminants under 42 U.S.C. § 9601(33), and in California Health and Safety Code ("H&SC") Section 25260. The Covenantors and the Trust, collectively referred to as the "Parties," hereby agree pursuant to Civil Code section 1471(c) and H&SC section 25355.5 that the use of the Property be restricted as set forth in this Covenant. The Parties further intend that the provisions of this Covenant also be for the benefit of the U.S. Environmental Protection Agency ("EPA") and the California Department of Toxic Substances Control ("DTSC") as third party beneficiaries.

ARTICLE I
STATEMENT OF FACTS

1.01. The Property is more particularly described and depicted in Exhibit A, attached hereto and incorporated herein by this reference. The Property is located in the area now generally bounded by Los Nietos Road, Greenleaf Avenue, and Santa Fe Springs Road, in the County of Los Angeles, State of California. The Property is more specifically described as Los Angeles County Assessor's Parcel No. 8167-002-049. A map of the Property is attached as Exhibit B.

1.02. The Property is a portion of the Waste Disposal, Inc. Superfund Site and was listed on the National Priority List on July 22, 1987 by EPA. Remediation of the Site is being conducted pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act, 42. U.S.C. §§ 9601 *et seq* ("CERCLA"). EPA has selected a remedy for the Site, which is documented in the Amended Record of Decision ("Amended ROD"), signed by EPA on June 21, 2002. The remedy includes construction of a RCRA-equivalent cap over the reservoir area in Area 2, use of engineered caps in portions of Areas 1, 2, 4, 5, 6, 7, and 8, installation and use of an active soil vapor extraction system and/or a soil gas monitoring system, use of a liquids collection system under the RCRA-equivalent cap, institutional controls, engineering controls in buildings overlying buried waste or soil gas noncompliance areas, use of in-business ambient air monitoring, long-term soil gas monitoring, long-term groundwater monitoring, and long-term operations, maintenance and monitoring. The Administrative Record for the Site is available for review at the Santa Fe Springs Public Library located at 11700 Telegraph Road in Santa Fe Springs, and at EPA's Region IX Records Center, located at 95 Hawthorne St., San Francisco, CA 94105.

1.03 Because waste will remain in place at the Site, EPA selected institutional controls as part of the remedy selected in the Amended ROD. The institutional controls will be implemented in order to ensure the long-term integrity of the remedy and to prevent exposure to waste remaining at the site. The Amended ROD provides for restrictive environmental covenants to be recorded on the properties at the Site to fulfill the purposes of protecting the remedy and preventing certain activities on and uses of the properties.

06 1903512

4

ARTICLE II
DEFINITIONS

2.01. DTSC. "DTSC" means the California Department of Toxic Substances Control and includes its successor agencies, if any.

2.02. EPA. "EPA" means the United States Environmental Protection Agency and includes its successor agencies, if any.

2.03. Owner. "Owner" means each Covenantor, its successors in interest, and their successors in interest, including heirs and assigns, who at any time hold title to or an ownership interest in, all or any portion of the Property.

2.04. Occupant. "Occupant" means Owners and any person or entity entitled by ownership, leasehold, or other legal relationship to the right to occupy any portion of the Property, and their successors in interest.

2.05. CERCLA Lead Agency. "CERCLA Lead Agency" means the governmental entity having the designated lead responsibility to implement response action under the National Contingency Plan ("NCP"), 40 C.F.R. Part 300. EPA is the CERCLA Lead Agency at the time of the recording of this instrument.

2.06. WDIG Site Trust. "WDIG Site Trust" means the grantee and Covenantee of this environmental restriction and its Trustee, and their successors in interest.

2.07. Waste Materials. "Waste Materials" means (1) any "hazardous substance" under Section 101(14) of CERCLA, 42 U.S.C. § 9601(14); (2) any pollutant or contaminant under Section 101(33), 42 U.S.C. § 9601(33); (3) any "solid waste" under Section 1004(27) of RCRA, 42 U.S.C. § 6903(27); (4) any "hazardous substance" under California Health and Safety Code §§ 25316 and 25317; and (5) all material identified as waste or sump material in site investigations conducted prior to the date this Covenant is recorded, irrespective of whether it is

06 1903512

classified as a hazardous substance, pollutant or contaminant, or solid waste under the above statutes.

ARTICLE III

GENERAL PROVISIONS

3.01. Restrictions to Run with the Land. This Covenant sets forth protective provisions, covenants, restrictions, and conditions (collectively referred to as "Restrictions"), subject to which the Property and every portion thereof shall be improved, held, used, occupied, leased, sold, hypothecated, encumbered, and/or conveyed. Covenantors covenant that each and every Restriction: (a) runs with the land pursuant to H&SC section 25355.5(a)(1)(C) and Civil Code section 1471; (b) inures to the benefit of and passes with each and every portion of the Property, (c) is for the benefit of and enforceable by the WDIG Site Trust (d) is for the benefit of EPA and DTSC as third party beneficiaries, and (e) is imposed upon the entire Property unless expressly stated as applicable only to a specific portion thereof.

3.02. Binding upon Owners/Occupants. Pursuant to H&SC section 25355.5(a)(1)(C), this Covenant binds all Owners of the Property, their heirs, successors, and assignees, and the agents, employees, and lessees of the Owners, heirs, successors, and assignees. Pursuant to Civil Code section 1471(b), all successive Owners of the Property are expressly bound hereby for the benefit of the WDIG Site Trust, EPA, and DTSC.

3.03. Written Notice of the Presence of Hazardous Substances. Prior to the sale, lease, sublease, assignment or other transfer of the Property, or any portion thereof, the Owner or Occupant or any other, lessor, sublessor, assignor or other transferor shall give the buyer, lessee, sublessee, assignee or other transferee written notice that hazardous substances are located on or beneath the Property, and provide written notice thereof to the WDIG Site Trust, EPA and DTSC.

3.04. Incorporation into Deeds and Leases. The Restrictions set forth herein shall be incorporated by reference in each and all deeds, leases, assignments, or other transfers of all or any portion of the Property which are hereafter executed or renewed. Further, each Owner or

06 1903512

Occupant shall include in any instrument conveying any interest in all or any portion of the Property, including but not limited to deeds, leases, and mortgages, a notice which is in substantially the following form:

NOTICE: THE INTEREST CONVEYED HEREBY IS SUBJECT TO AN ENVIRONMENTAL RESTRICTION AND COVENANT TO RESTRICT USE OF PROPERTY, RECORDED IN THE OFFICIAL RECORDS OF LOS ANGELES COUNTY, CALIFORNIA, ON __ [DATE] __, AS INSTRUMENT NO. _____, IN FAVOR OF AND ENFORCEABLE BY THE WDIG SITE TRUST, AND FOR THE BENEFIT OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY AND THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.

3.05. Conveyance of Property. The Owner shall provide notice to the WDIG Site Trust, and to EPA and DTSC not later than thirty (30) days after any conveyance of any ownership interest in the Property (excluding mortgages, liens, and other non-possessory encumbrances). The WDIG Site Trust, EPA, and DTSC shall not, by reason of this Covenant, have authority to approve, disapprove, or otherwise affect such proposed conveyance, except as otherwise provided by law, by administrative order, consent decree or by a specific provision of this Covenant.

ARTICLE IV RESTRICTIONS

4.01 New or Modified Buildings. The Covenantors covenant that if any Owner or an Occupant constructs a new building or other permanent structure on the Property, or substantially modifies an existing building or other permanent structure on the Property, and such modification requires a City of Santa Fe Springs building or other land use permit, Owner or Occupant shall implement and maintain any necessary engineered capping system(s) and any necessary engineering control(s) related to the new or modified building or other permanent

structure, in conformance with the provisions of the Amended ROD and as specified by EPA. Such capping system and engineering controls shall be implemented only with the prior written approval of EPA.

4.02 Prohibited Uses. The Property shall not be used in any manner that would interfere with or adversely affect the implementation, integrity, or protectiveness of the remedial measures to be performed pursuant to the Amended ROD or any future response actions required by EPA. Owners and Occupants shall ensure compliance by all users of the Property with the following land/water use restrictions, except as otherwise authorized by EPA to implement the remedy selected in the Amended ROD or any future response action required by EPA.

- (a) Placement of warning signs or other posted information shall be allowed and, once posted, no removal or interference with such signs or information shall be permitted.
- (b) Placement of site access controls, such as gates or fencing, shall be allowed and shall not be damaged or circumvented.
- (c) The Property shall not be used in any manner that may interfere with or affect the integrity of the remedial cap or other components of the remedy, as constructed pursuant to the Amended ROD.
- (d) Construction not approved by EPA that impacts any of the remedial capping or other remedy components shall not occur.
- (e) No interferences with or alterations to the grading, vegetation and surface water and drainage controls shall be made.
- (f) Portions of the Property underlain by Waste Materials and in soil gas noncompliance areas shall not be regraded.
- (g) Areas of asphalt or concrete pavement shall not be removed or improved.
- (h) No penetrations through or interferences (including, but not limited to, utility trench excavations, excavations for fence posts, excavations for planting trees or large bushes, foundation excavations, and foundation piles) with the remedial cap or any other areas with remedial controls shall be made.
- (i) Deep-rooting plants (plants whose root systems will penetrate more than two feet below ground surface) shall not be planted.
- (j) Owners and Occupants shall obtain approval from EPA for settings of irrigation

controls in areas underlain by Waste Materials. Such settings shall not be changed without the prior written approval of EPA in accordance with Section 5.01 unless such settings are approved by EPA as part of the remedy selected in the Amended ROD.

- (k) Drainage channels and pipes shall not be blocked, rerouted or otherwise interfered with.
- (l) No new openings shall be made in building floor slabs in buildings located over Waste Materials or over soil gas noncompliance areas.
- (m) Integrity of existing and future foundations shall be maintained in areas underlain by Waste Materials and in soil gas noncompliance areas. All cracks or damage in such foundations shall be reported to the WDIG Site Trust and EPA and the Covenantors covenant that such cracks or damage shall be repaired by the Owner or Occupant.
- (n) Indoor gas controls shall not be circumvented.
- (o) Indoor gas sensors or alarms shall not be turned off or interfered with.
- (p) Soil gas control systems shall not be turned off or interfered with.
- (q) Monitoring points, including but not limited to groundwater monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, and survey monuments, shall not be blocked or otherwise obstructed.
- (r) Monitoring wells shall not be opened; nothing shall be placed into the monitoring wells.
- (s) Liquids recovery systems, liquids treatment systems, and treated liquids storage facilities shall not be turned off or interfered with.
- (t) Groundwater supply or monitoring wells shall not be constructed.
- (u) Owners of the Property shall disclose all land/water use restrictions to all Occupants on the property.
- (v) Owners shall inform the WDIG Site Trust and EPA of the identities of all Occupants on the Property.
- (w) During construction, excavation, or grading of any type on the Property, Owner or Occupant shall take measures to ensure that there is no offsite migration of dust, odors or organic vapors. During such activities, Owner or Occupant shall take appropriate measures to protect the health and welfare of onsite personnel and workers and to prevent offsite impacts.

06 1903512

- 9
- (x) Owner or Occupant must obtain prior written approval for all building or site modifications on the Property from EPA in accordance with Section 4.01 and Section 5.01.
 - (y) Owner or Occupant shall not excavate Waste Materials on the Site, except as authorized by EPA.
 - (z) No new construction shall occur on the Property without the prior written approval of EPA in accordance with Section 5.01 and the following requirements:
 - (i) New construction shall be supported by subsurface explorations and analytical laboratory data to characterize the construction area for the possible existence of Waste Materials.
 - (ii) If Waste Materials are discovered in the construction area, they shall be remediated or buildings and structures must be appropriately designed to protect occupants.
 - (iii) Appropriate worker and public health and safety precautions, including but not limited to dust control, safety plans, and other forms of worker protection, must be taken prior to approval of construction.
 - (aa) Boreholes, foundation piles, or other subsurface penetrations into the reservoir or any other area of the site which could create conduits allowing Waste Materials to migrate to groundwater shall not be made.
 - (bb) Construction workers shall be provided with appropriate personal protective equipment while they are working at the site.
 - (cc) Pesticides or herbicides shall not be applied to the capped areas of the site or to areas surrounding monitoring points, except as approved by EPA for use in implementing the remedy selected in the Amended ROD.
 - (dd) Use of any septic tanks on the property shall be discontinued and such tanks shall be decommissioned in accordance with local regulations.
 - (ee) The Property shall not be used or redeveloped for residential use; use as a hospital, school for people aged 21 and under, or day care center; or other similar uses by sensitive receptors.

4.03. Access for the WDIG Site Trust. The WDIG Site Trust and EPA, and through them, their respective employees, agents, contractors, subcontractors, consultants, and other third parties authorized by the WDIG Trust and EPA shall have reasonable right of entry and access to

10

the Property for implementing any response actions, inspection, monitoring, and other activities consistent with the purposes of this Covenant as deemed necessary by EPA in order to protect the public health or safety, or the environment. Such activities shall include, but not be limited to:

- (a) Maintaining and monitoring the remedial action selected in the Amended ROD;
- (b) Verifying any data or information submitted to EPA;
- (c) Conducting investigations relating to Waste Materials at or near the Property;
- (d) Obtaining samples;
- (e) Assessing the need for, planning, or implementing additional response actions at or near the Property, if authorized by EPA;
- (f) Assessing implementation of quality assurance and quality control practices as defined in the Quality Assurance Project Plans approved by EPA for the remedial actions;
- (g) Implementing the remedy selected in the Amended ROD;
- (h) Assessing Owner's or Occupant's compliance with this Covenant; and
- (i) Determining whether the Property is being used in a manner that is prohibited or restricted, or that may need to be prohibited or restricted, in accordance with the Amended ROD.

Nothing in this instrument shall limit or otherwise affect EPA's right of entry and access, or EPA's authority to take response actions under CERCLA, the National Contingency Plan, 40 C.F.R. Part 300, and its successor provisions, or any federal law.

4.04. Enforcement. The WDIG Site Trust shall be entitled to enforce the terms of this instrument by resort to specific performance or legal process and injunctive relief. Failure of a Covenantor, Owner or Occupant to comply with any of the Restrictions specifically applicable to it shall be grounds for the WDIG Site Trust to require that the Covenantor, Owner, or Occupant modify or remove any improvements ("Improvements" herein shall mean all buildings, other structures, landscaping, roads, driveways, and paved parking areas) constructed or placed upon any portion of the Property in violation of the Restrictions. All remedies available hereunder shall be in addition to any and all other remedies at law or in equity, including CERCLA or state law, and violation of this Covenant shall be grounds for the WDIG Site Trust to file civil actions as provided by law or equity. The WDIG Site Trust for itself and on behalf of any person or entity responsible for any response action authorized or required by EPA (collectively "Responsible Parties") shall be entitled to recover damages for any violation of the terms of this

Covenant, including but not limited to, the costs incurred by the WDIG Site Trust or by the Responsible Parties to repair any damage to any remedial facilities or any other feature of any response action or to perform the maintenance of the Improvements, and any expenditures incurred by the Trust or such Responsible Parties to reimburse EPA for the agencies' oversight and enforcement costs related to this Covenant or violations thereof. Enforcement of the terms of this Covenant shall be at the discretion of the Covenantee and the third party beneficiaries and any forbearance, delay or omission to exercise their rights under this Covenant for breach hereof shall not be deemed a waiver by them of any such breach or subsequent breach of any term of this Covenant, or of any of their rights under this Covenant.

4.05 Attorneys' Fees. The WDIG Site Trust shall be entitled to recover its attorneys' fees and any costs from Owner and/or Occupant for any efforts, including but not limited to any legal actions, by the WDIG Site Trust to enforce the terms of this Covenant if the WDIG Site Trust prevails in such efforts or legal action.

ARTICLE V

EXCEPTIONS, TERMINATION, AND TERM

5.01 Exceptions to Land/Water Use Restrictions. If an Owner or an Occupant seeks an exception to the land/water use restrictions in Section 4.01, Owner or Occupant shall obtain the prior written approval of EPA. Owner or Occupant shall submit a request in writing to EPA and to DTSC, with all necessary supporting documentation (such documentation may include appropriate design documents, work plans, and/or calculations). EPA shall respond to such request within a reasonable time, by: 1) providing written approval for the exception; 2) requesting further information in support of the request; 3) providing written approval of the exception with modification; or 4) denying the request. The decision of EPA shall be final and shall not be subject to judicial review. If requested by EPA, any approved exception shall be recorded in the Official Records of Los Angeles County in an Amended and restated Covenant by the person or entity granted the exception.

5.02 Modification. The land/water use restrictions of this Covenant may only be modified upon the written agreement of each Owner and the WDIG Site Trust, with the prior express written approval of EPA. Such modifications shall become effective when they are

12

incorporated into this Covenant and such modified and restated Covenant is executed by each Owner and the WDIG Site Trust and recorded by the Owner.

5.03 Termination. A Covenantor, or any other aggrieved person, may apply to the EPA for a termination of the Restrictions or other terms of this Covenant as they apply to all or any portion of the Property. The decision of EPA regarding any such request shall be final and not subject to judicial review.

5.04 Term. Unless ended in accordance with the Termination paragraph above or by law, this Covenant shall continue in effect in perpetuity.

5.05 Assignment. The WDIG Site Trust, EPA and DTSC may freely assign their interests in this Covenant to any other parties without the approval of the Covenantors. The WDIG Site Trust shall obtain the written consent of EPA prior to any assignment of its interests under this Covenant.

ARTICLE VI

MISCELLANEOUS

6.01. No Dedication or Taking. Nothing set forth in this Covenant shall be construed to be a gift or dedication, or offer of a gift or dedication, of the Property, or any portion thereof to the general public or anyone else for any purpose whatsoever. Further, nothing set forth in this Covenant shall be construed to effect a taking under state or federal law.

6.02. Notices. Whenever any person gives or serves any Notice ("Notice" as used herein includes any demand or other communication with respect to this Covenant), each such Notice shall be in writing and shall be deemed effective: (1) when delivered, if personally delivered to the person being served or to an officer of a corporate party being served, or (2) three (3) business days after deposit in the mail, if mailed by United States mail, postage paid, certified, return receipt requested:

06 1903512

13

To Owners:

Gwen Campbell
c/o Christa Huddle
235 E. Blossom Place
Brea, CA 92821

Diane Cote, Trustee
Phil Campbell and Diane Cote Family Trust
13068 Caminito Mar Villa
Del Mar, CA 92014-3608

To WDIG Site Trust:

Michael J. Skinner
Trustee of the WDIG Site Trust
Michael J. Skinner Consulting, LLC
230 Kings Highway East, #300
Haddonfield, NJ 08033

To EPA:

Russell Mechem
Remedial Project Manager
U.S. Environmental Protection Agency, Region IX
75 Hawthorne St.
San Francisco, CA 94105
Re: WDI Superfund Site

Sarah E. Mueller
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region IX
75 Hawthorne St.
San Francisco, CA 94105
Re: WDI Superfund Site

To DTSC:

Sara Amir
Chief, Southern California Cleanup Operations Branch
Department of Toxic Substances Control
1011 N. Grandview Ave.
Glendale, CA 91201

Any party may change its address or the individual to whose attention a Notice is to be sent by giving written Notice in compliance with this paragraph.

06 1903512

14

6.03. Partial Invalidity. If any portion of the Restrictions or other terms set forth herein is determined by a court of competent jurisdiction to be invalid for any reason, the surviving portions of this Covenant, or the application of such portions to persons or circumstances other than those to which it is found to be invalid, shall remain in full force and effect as if such portion found invalid had not been included herein.

6.04. Liberal Construction. Any general rule of construction to the contrary notwithstanding, this instrument shall be liberally construed to effect the purpose of this instrument and the policy and purpose of CERCLA. If any provision of this instrument is found to be ambiguous, an interpretation consistent with the purpose of this instrument that would render the provision valid shall be favored over any interpretation that would render it invalid.

6.05. Third Party Beneficiary. EPA's and DTSC's rights as third party beneficiaries of this Covenant shall be construed pursuant to principles of contract law under the statutory and common law of the State of California.

6.06. Statutory References. All statutory references include successor provisions.

6.07. Waiver of Certain Defenses. Covenantors hereby waive any defense of laches, estoppel or prescription.

6.08. Covenants. Covenantors hereby covenants to and with the Covenantee that the Covenantors are the owners in fee of the Property; that Covenantors have a good and lawful title and have the right and power to impose this Covenant on the Property; that the Property is free and clear of encumbrances as of the date hereof, except those listed in Exhibit C.

Notwithstanding the foregoing, nothing herein shall prevent, preclude, limit or otherwise restrict the filing or recording against the Property of any liens (including but not limited to mortgages, deeds of trust and/or security agreements), encumbrances, covenants, conditions, restrictions, or other documents or instruments, provided that any such liens, encumbrances, covenants, conditions, restrictions, or other documents or instruments shall be subject and subordinate to this Covenant.

06 1903512

16

6.09. Controlling Law. Except as otherwise provided in Section 7.06, the interpretation and performance of this Covenant shall be governed by the laws of the United States or, if there are no applicable federal laws, by the law of the State of California.

6.10. Joint Obligations. If there are two or more parties identified as Covenantor in the Covenant, the obligations imposed by this Covenant upon them shall be joint and several.

6.11. Captions. The captions in this Covenant have been inserted solely for convenience of reference and are not a part of this Covenant and shall have no effect upon construction or interpretation.

6.12. Counterparts. The parties may execute this Covenant in two or more counterparts, which shall, in the aggregate, be signed by both parties; each counterpart shall be deemed an original instrument as against any party who has signed it. In the event of any disparity between the counterparts produced, the recorded counterpart shall be controlling.

06 1903512

10

STATE OF NEW JERSEY

)

)

COUNTY OF CAMDEN

)

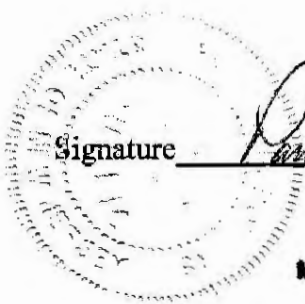
On this 7th day of August, in the year 2006,

before me Pamela D. Powers, personally appeared

Michael J. Skinner,

personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.



Signature

Pamela D. Powers

PAMELA D. POWERS
Notary Public of New Jersey
My Commission Expires 3/2/2011

06 1903512

17

IN WITNESS WHEREOF, the Parties execute this Covenant.

Covenantor: Gwen Campbell

By: Gwen Campbell

Title:

Date: 8/14/06

Covenantor: Phil Campbell and Diane Cote Family Trust

By: _____

Title:

Date: _____

WDIG Site Trust:

By: _____

Title:

Date: _____

06 1903512

18

IN WITNESS WHEREOF, the Parties execute this Covenant.

Covenantor: Gwen Campbell

By: _____

Title:

Date: _____

Covenantor: Phil Campbell and Diane Cote Family Trust

By: _____

Title:

Date: _____

WDIG Site Trust:

By: M J Skinner

Title: Trustee

Date: 8/7/06

06 1903512

19

STATE OF CALIFORNIA)
)
COUNTY OF Orange)

On this 14th day of August, in the year 2006,

before me Diane J. Iverson, Notary, personally appeared
Public

Gwen Campbell

personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.



Signature *Diane J. Iverson*

06 1903512

70

IN WITNESS WHEREOF, the Parties execute this Covenant.

Covenantor: Gwen Campbell

By: _____

Title: _____

Date: _____

Covenantor: Phil Campbell and Diane Cote Family Trust

By: Diane Cote

Title: trustee for Phil Campbell and Diane Cote

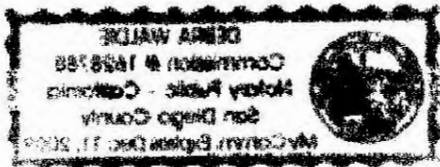
Date: August 1st 2006 Family Trust

WDIG Site Trust:

By: _____

Title: _____

Date: _____



06 1903512

06 1903512

21

STATE OF CALIFORNIA)

COUNTY OF)

San Diego

On this 1st day of August, in the year 2006,

before me Debra Waldie Notary Public, personally appeared

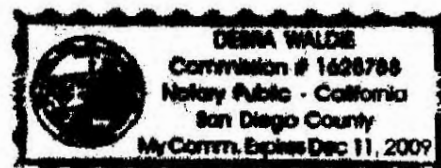
Diane Cote

~~personally known to me~~ (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is /are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature

Debra Waldie



06 1903512

Exhibit A

PARCEL NUMBER 8167-002-049

Legal Description:

Parcel 1 of Parcel Map No. 14608, in the City of Santa Fe Springs, in the County of Los Angeles, State of California, as per map filed for record in Book 149, Pages 6 through 8, inclusive of Parcel Maps, in the Office of the County Recorder of Said County.

Except therefrom all oil, gas, and petroleum substances and other minerals contained in or under said property as reserved by Chanslor Caufield Midway Oil Company, a corporation, in Deed recorded January 22, 1932 in Book 11335 Page 264 Official Records.

06 1903512

Exhibit B
Map of Property

23

06 1903512

24

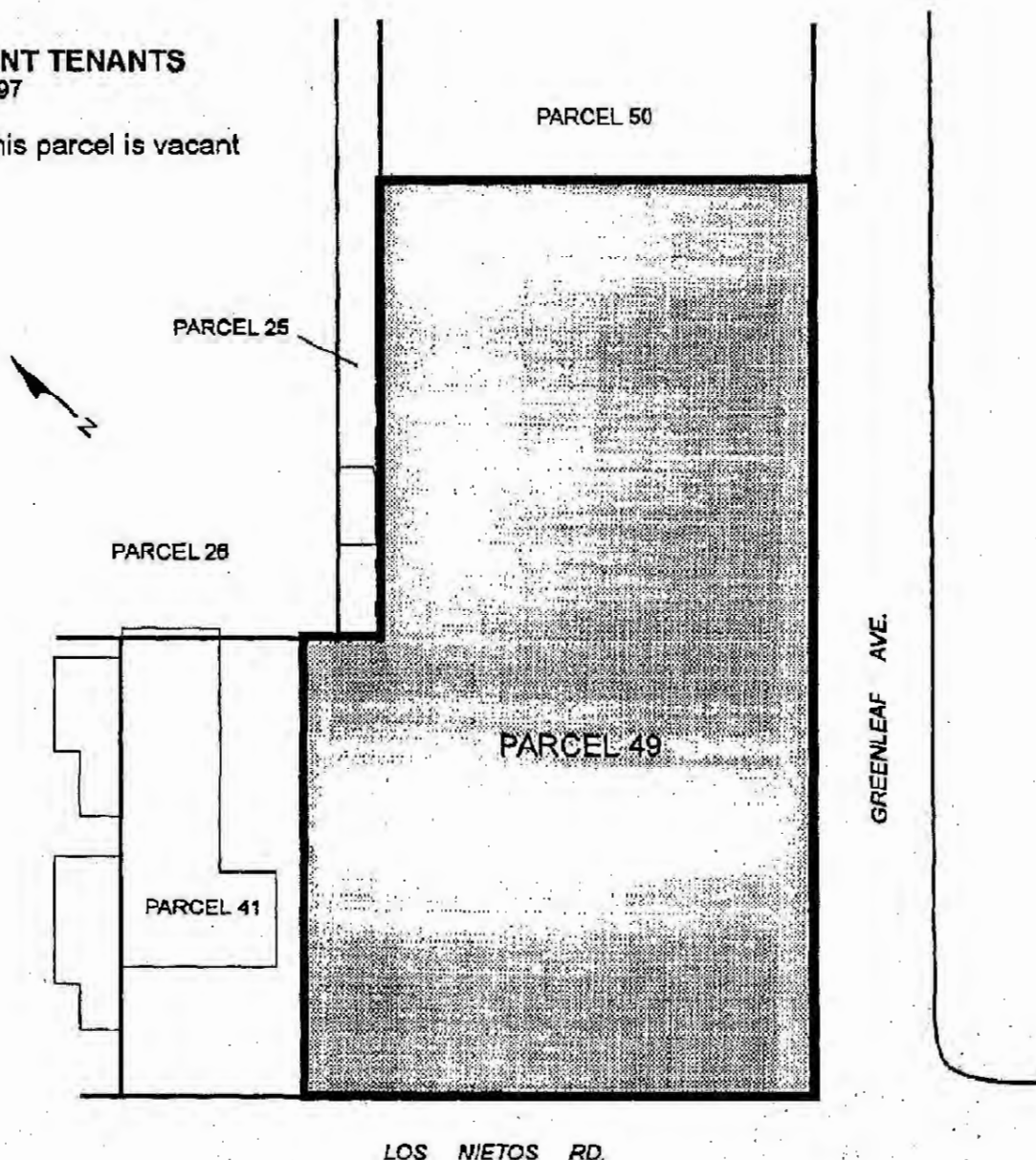
**WASTE DISPOSAL, INC.
SANTA FE SPRINGS, CALIFORNIA
APN 8167-002-049**

**CURRENT PARCEL OWNER
AS OF 2/97**

Phil Campbell and Gwen H. Campbell

**CURRENT TENANTS
AS OF 3/97**

None; this parcel is vacant



06 1903512

25

Exhibit C
Encumbrances

06 1903512



Commonwealth Land Title Company
915 Wilshire Boulevard
Suite 2100
Los Angeles, CA 90017
Phone: (213) 330-3100

LandAmerica Commercial Services
One Market Street
Spear Street Tower #1850
San Francisco, CA 94105

Our File No: 06154537 - 27
Title Officer: Doug Abernathy
e-mail: dabernathy@landam.com
Direct Phone: (213) 330-3055
Fax: (213) 330-3104

Attn: Amber Adams

Your Reference No: 9951 Greenleaf

Property Address: 9951 Greenleaf Avenue, Santa Fe Springs, California

PRELIMINARY REPORT

Dated as of June 1, 2006 at 7:30 a.m.

In response to the above referenced application for a policy of title insurance, Commonwealth Land Title Company hereby reports that it is prepared to issue, or cause to be issued, as of the date hereof, a Policy or Policies of Title Insurance describing the land and the estate or interest therein hereinafter set forth, insuring against loss which may be sustained by reason of any defect, lien or encumbrance not shown or referred to as an Exception below or not excluded from coverage pursuant to the printed Schedules, Conditions and Stipulations of said policy forms.

The printed Exceptions and Exclusion from the coverage and Limitations on Covered Risks of said Policy or Policies are set forth in Exhibit B attached. Limitations on Covered Risks applicable to the CLTA and ALTA Homeowner's Policies of Title Insurance which establish a Deductible Amount and a Maximum Dollar Limit of Liability for certain coverages are also set forth in Exhibit B. Copies of the Policy forms should be read. They are available from the office which issued this report.

Please read the exceptions shown or referred to below and the exceptions and exclusions set forth in Exhibit B of this report carefully. The exceptions and exclusions are meant to provide you with notice of matters which are not covered under the terms of the title insurance policy and should be carefully considered. It is important to note that this preliminary report is not a written representation as to the condition of title and may not list all liens, defects, and encumbrances affecting title to the land.

This report (and any supplements or amendments hereto) is issued solely for the purpose of facilitating the issuance of a policy of title insurance and no liability is assumed hereby. If it is desired that liability be assumed prior to the issuance of a policy of title insurance, a Binder or Commitment should be requested.

87

File No: 06154537

SCHEDULE A

The form of policy of title insurance contemplated by this report is:

CLTA Standard Owners

ALTA Loan 1992

The estate or interest in the land hereinafter described or referred to covered by this report is:

A FEE

Title to said estate or interest at the date hereof is vested in:

Gwen Campbell, a single woman, who acquired title as wife of Phil Campbell, as to an undivided one-half interest and Phil Campbell and Diane Cote, Trustees of the Phil Campbell and Diane Cote Family Trust UTD June 11, 1999, as his sole and separate property, as to an undivided one-half interest, as tenants in common, subject to Item No. 18, of Schedule B.

The land referred to herein is situated in the County of Los Angeles, State of California, and is described as follows:

SEE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF

06 1903512

06 1903512

File No: 06154537

EXHIBIT "A"

All that certain real property situated in the County of Los Angeles, State of California, described as follows:

Parcel 1 of Parcel map No. 14608, in the City of Santa Fe Springs, County of Los Angeles, State of California, as per map filed for record in Book 149, Page(s) 6 to 8, inclusive of Parcel Maps, in the Office of the County Recorder of said County.

Except therefrom all oil, gas and petroleum substances and other minerals contained in or under said property as reserved by Chanslor Canfield Midway Oil Company, a Corporation, in deed recorded January 22, 1932, in Book 11335, Page 264, Official Records.

Assessor's Parcel Number: **8167-002-049**

8167-002-049

06 1903512

File No: 06154537

SCHEDULE B

At the date hereof Exceptions to coverage in addition to the printed exceptions and exclusions in said policy form would be as follows:

A. Property taxes, including general and special taxes, personal property taxes, if any, and any assessments collected with taxes, to be levied for the fiscal year 2006 - 2007 which are a lien not yet payable.

B. Property taxes, including general and special taxes, personal property taxes, if any, and any assessments collected with taxes, for the fiscal year shown below, are paid. For proration purposes the amounts are:

Fiscal year	2005 - 2006
1st Installment:	\$2,861.41
2nd Installment:	\$2,861.40
Exemption:	\$none
Code Area:	09106
Assessment No.:	8167-002-049

C. Supplemental or escaped assessments of property taxes, if any, assessed pursuant to the Revenue and Taxation Code of the State of California.

1. An easement for the purpose shown below and rights incidental thereto as set forth in a document

Purpose:	Public utilities
Recorded:	February 15, 1951, as Instrument No. 2415, Official Records
Affects:	Portions of the herein described land, the exact location of which can be determined by examination of the above-mentioned instrument, which contains a complete legal description of the affected portions of said land.

2. An easement for the purpose shown below and rights incidental thereto as set forth in a document

Purpose:	Public utilities
Recorded:	July 3, 1951, as Instrument No. 2712, Official Records
Affects:	Portions of the herein described land, the exact location of which can be determined by examination of the above-mentioned instrument, which contains a complete legal description of the affected portions of said land.

06154537

30

File No: 06154537

3. An easement for the purpose shown below and rights incidental thereto as set forth in a document

Purpose: Public utilities
 Recorded: June 7, 1954, as Instrument No. 2403, Official Records
 Affects: Portions of the herein described land, the exact location of which can be determined by examination of the above-mentioned instrument, which contains a complete legal description of the affected portions of said land.

4. An easement for the purpose shown below and rights incidental thereto as set forth in a document

Purpose: Public utilities
 Recorded: August 19, 1954, as Instrument No. 3212, in Book 45363, Page 392, Official Records
 Affects: Portions of the herein described land, the exact location of which can be determined by examination of the above-mentioned instrument, which contains a complete legal description of the affected portions of said land.

5. An easement for the purpose shown below and rights incidental thereto as set forth in a document

Purpose: Public utilities
 Recorded: September 6, 1955, as Instrument No. 3587, in Book 48870, Page 303, Official Records
 Affects: Portions of the herein described land, the exact location of which can be determined by examination of the above-mentioned instrument, which contains a complete legal description of the affected portions of said land.

6. An easement for the purpose shown below and rights incidental thereto as set forth in a document

Purpose: Public utilities
 Recorded: June 21, 1961, as Instrument No. 4473, in Book D-1261, Page 363, Official Records
 Affects: Portions of the herein described land, the exact location of which can be determined by examination of the above-mentioned instrument, which contains a complete legal description of the affected portions of said land.

7. Water rights, claims or title to water, whether or not shown by the public records.

06 1903512

516001 00

File No: 06154537

31

8. A deed of trust to secure an indebtedness in the amount shown below, and any other obligations secured thereby.

Amount: \$98,000.00
 Dated: December 4, 1973
 Trustor: Phil Campbell and Gwen H. Campbell, husband and wife
 Trustee: Security Pacific National Bank, a National Banking Association
 Beneficiary: Nollie B. Hudson, a single woman as to an undivided 1/2 interest and Bessie Hudson, a single woman, as to an undivided 1/2 interest, tenants in common
 Loan No.: Not Shown
 Recorded: December 31, 1973, as Instrument No. 401, Official Records

The legal description of said Deed of Trust was modified by the judgment recorded May 28, 1982, as Instrument No. 82-549240, Official Records.

If the above-mentioned deed of trust has been paid, or will be paid prior to or at close of escrow, this Company will require the original note, deed of trust and signed request for reconveyance, or the executed full reconveyance for said deed of trust, prior to closing. Any demand(s) for payoff and/or request(s) for full/partial reconveyance, must be executed by all beneficiaries or their successors in interest and their spouses, if married. In the event said beneficiaries/assignees are represented by an agent, proof of agency must be submitted along with the demand(s) and/or request(s) for full/partial reconveyance. To avoid delays please submit all documents to the Company at least one week prior to closing. If you cannot obtain these documents, please contact us.

9. A deed of trust to secure an indebtedness in the amount shown below, and any other obligations secured thereby.

Amount: \$98,000.00
 Dated: December 4, 1973
 Trustor: Phil Campbell and Gwen H. Campbell, husband and wife
 Trustee: Security Pacific National Bank, a National Banking Association
 Beneficiary: Delmer L. Carter and Zelda M. Carter, husband and wife as community property
 Loan No.: Not Shown
 Recorded: December 31, 1973, as Instrument No. 402, Official Records

An agreement to modify the terms and provisions of said deed of trust as therein provided
 Executed by: Delmer L. Carter and Zelda M. Carter, and Phil Campbell and Gwen H. Campbell
 Recorded: July 29, 1975, as Instrument No. 335, Official Records

An assignment of an undivided 1/2 interest in the beneficial interest under said deed of trust which names

As Assignor: Delmer L. Carter
 As Assignee: Security Pacific National Bank, as Trustee
 Recorded: June 18, 1980, as Instrument No. 80-589720, Official Records

The legal description of said Deed of Trust was modified by the judgment recorded May 28, 1982, as Instrument No. 82-549240, Official Records.

SLC001 00
 000000

38

File No: 06154537

If the above-mentioned deed of trust has been paid, or will be paid prior to or at close of escrow, this Company will require the original note, deed of trust and signed request for reconveyance, or the executed full reconveyance for said deed of trust, prior to closing. Any demand(s) for payoff and/or request(s) for full/partial reconveyance, must be executed by all beneficiaries or their successors in interest and their spouses, if married. In the event said beneficiaries/assignees are represented by an agent, proof of agency must be submitted along with the demand(s) and/or request(s) for full/partial reconveyance. To avoid delays please submit all documents to the Company at least one week prior to closing. If you cannot obtain these documents, please contact us.

10. A deed of trust to secure an indebtedness in the amount shown below, and any other obligations secured thereby.

Amount: \$318,000.00
 Dated: January 31, 1985
 Trustor: Phil Campbell and Gwen H. Campbell, husband and wife as their community property
 Trustee: First American Title Insurance Company, a California Corporation
 Beneficiary: Citizens Bank of Costa Mesa, a California Corporation
 Loan No.: Not Shown
 Recorded: February 4, 1985, as Instrument No. 85-127300, Official Records

11. A document subject to all the terms, provisions and conditions therein contained.

Entitled: Loan Agreement
 Dated: November 2, 1987
 By and between: Redevelopment Agency of the City of Santa Fe Springs, and Phil Campbell
 Recorded: November 12, 1987, as Instrument No. 87-1811324, Official Records

Reference is made to said document for full particulars.

12. A deed of trust to secure an indebtedness in the amount shown below, and any other obligations secured thereby.

Amount: \$47,468.56
 Dated: August 16, 1991
 Trustor: Phil Campbell
 Trustee: Trustors Security Service, a California Corporation
 Beneficiary: Leslie R. Jones
 Loan No.: Not Shown
 Recorded: September 18, 1991, as Instrument No. 91-1475444, Official Records

If the above-mentioned deed of trust has been paid, or will be paid prior to or at close of escrow, this Company will require the original note, deed of trust and signed request for reconveyance, or the executed full reconveyance for said deed of trust, prior to closing. Any demand(s) for payoff and/or request(s) for full/partial reconveyance, must be executed by all beneficiaries or their successors in interest and their spouses, if married. In the event said beneficiaries/assignees are represented by an agent, proof of agency must be submitted along with the demand(s) and/or request(s) for full/partial reconveyance. To avoid delays please submit all documents to the Company at least one week prior to closing. If you cannot obtain these documents, please contact us.

06154537 30

33

File No: 06154537

13. The matters contained in a document entitled "Notice that Weeds on Property are a Public Nuisance and that Abatement has been or will be done by County and Property Assessed" recorded November 15, 1994, as Instrument No. 94-2058803, of Official Records.

Reference is made to said document for full particulars.

It is further estimated that the cost of such abatement will be \$2,054.88 or more.

14. A pending court action as disclosed by a recorded notice.

Plaintiff: Harvey & Parmelee (formerly known as Darling, Wold & Agee), a California partnership
 Defendant: Phil Campbell, an individual; Gwendolyn Campbell, an individual; Campbell Pattern Works, Inc., a California Corporation; and Does 1 through 25, inclusive
 County: Los Angeles
 Court: Superior Court
 Case No.: VC 002506
 Nature of Action: Obtain an order amending the judgment entered on October 9, 1992 nunc pro tunc to correct clerical errors; specifically, the clerical errors appear in both the common and legal description of certain real property obtained therein.
 Recorded: April 23, 2003, as Instrument No. 03-1156140, Official Records

The terms and provisions contained in the document entitled "Nunc Pro Tunc Judgment by Court After Stipulation for Settlement (CCP Section 664.6)", recorded November 26, 2003, as Instrument No. 03-3583571, Official Records.

15. The matters contained in a document entitled "Notice of Lien Under Comprehensive Environmental Response, Compensation & Liability Act of 1980, as amended" recorded June 16, 2003, as Instrument No. 03-1707778, of Official Records.

Reference is made to said document for full particulars.

16. An abstract of judgment for the amount shown below and any other amounts due.

Debtor: Phil Campbell
 Creditor: Leslie R. Jones
 Date entered: December 2, 1998
 County: Orange County
 Court: Superior Court
 Case No.: 796837
 Amount: \$98,981.43, including penalty and costs
 Recorded: January 22, 1999, as Instrument No. 99-106114, Official Records
 Attorney or Party without an Attorney: Leslie R. Jones
 Law Offices of Leslie R. Jones
 390 N Brea Blvd., Suite A
 Brea, California 92821
 Telephone No.: (714) 255-8500

No examination of said proceedings has yet been made. Upon completion of our examination we will advise you of our findings.

06154537 00

06 1903512

34

File No: 06154537

17. An abstract of judgment for the amount shown below and any other amounts due.

Debtor:	Phil Campbell and Gwendolyn Campbell
Creditor:	Harvey & Parmelee (fka Darling, Wold & Agee)
Date entered:	October 9, 1992, (Renewal entered on August 26, 2002)
County:	Los Angeles
Court:	Superior Court
	Southeast - Norwalk
Case No.:	VC002506
Amount:	\$427,968.20, including penalty and costs
Recorded:	February 6, 2003, as Instrument No. 03-366141, Official Records
Attorney or	
Party without an Attorney:	Alexander D. Thomson, Esq.
	Thomson & Nelson
	15111 East Whittier Blvd., Suite 400
	Whittier, CA 90603-2189
Telephone No.:	(562) 945-3536

No examination of said proceedings has yet been made. Upon completion of our examination we will advise you of our findings.

18. Any invalidity or defect in the title of Vestees in the event such trust is invalid or fails to confer sufficient powers in the trustees or in the event there is lack of compliance with the terms and provisions of the trust instrument
19. Matters which may be disclosed by an inspection or by a survey of said land that is satisfactory to this Company, or by inquiry of the parties in possession thereof.

An inspection of said land has been ordered, which may result in additional exceptions.

END OF SCHEDULE B EXCEPTIONS

PLEASE REFER TO THE "NOTES AND REQUIREMENTS SECTION" WHICH FOLLOWS FOR INFORMATION NECESSARY TO COMPLETE THIS TRANSACTION

06 1903512

Appendix F
Institutional Control Technical Memorandum

Attachment 3
WDIG/Terradex PowerPoint Deck
(from March 4, 2014 interview w/ WDIG)

TERRADEX

IC MONITORING OVERVIEW: WDI SITE

LandWatch Monitoring Overview.

2

Terradex collects and maps multiple categories of land activity at and around LandWatch zones.

Land Activity Events are screened and filtered against objectives for each monitoring zone to trigger alerts.

Monitored Activity Data Sources

Sales and Transactions



- Real Estate Listings
- Real Estate Sales
- Foreclosure Actions
- Pre-Foreclosure
- Tax Liens
- Bankruptcies
- Commercial Lease
- Easements

Local Government



- Building Permits
- Zoning Changes

Excavation Clearance



- Excavation Permits
- Excavation Clearance
- Well Construction
- Dredge/Fill Permits

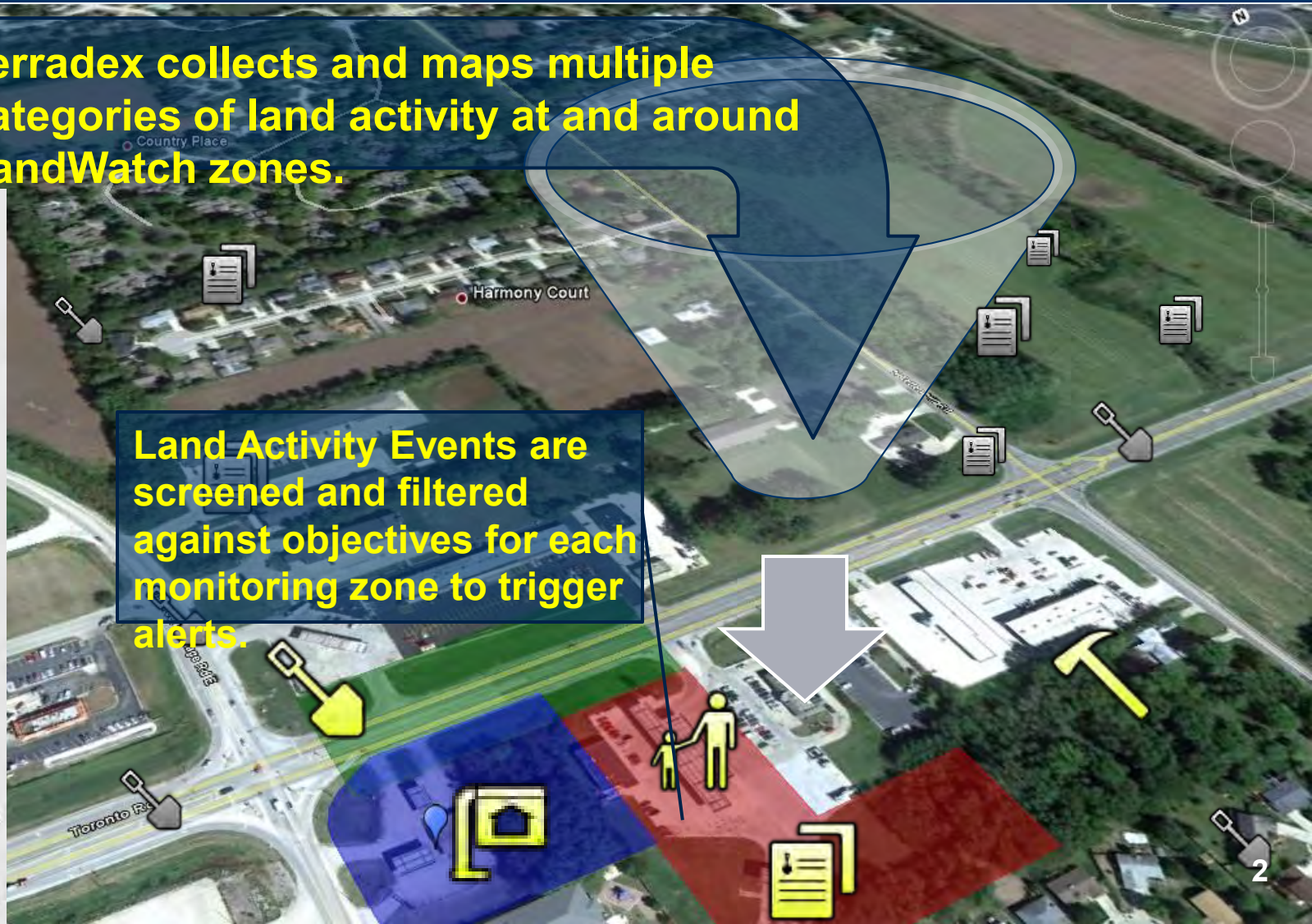
Sensitive Uses



- Childcare Licensing
- New Occupancies
- New Businesses
- New Educational Sites

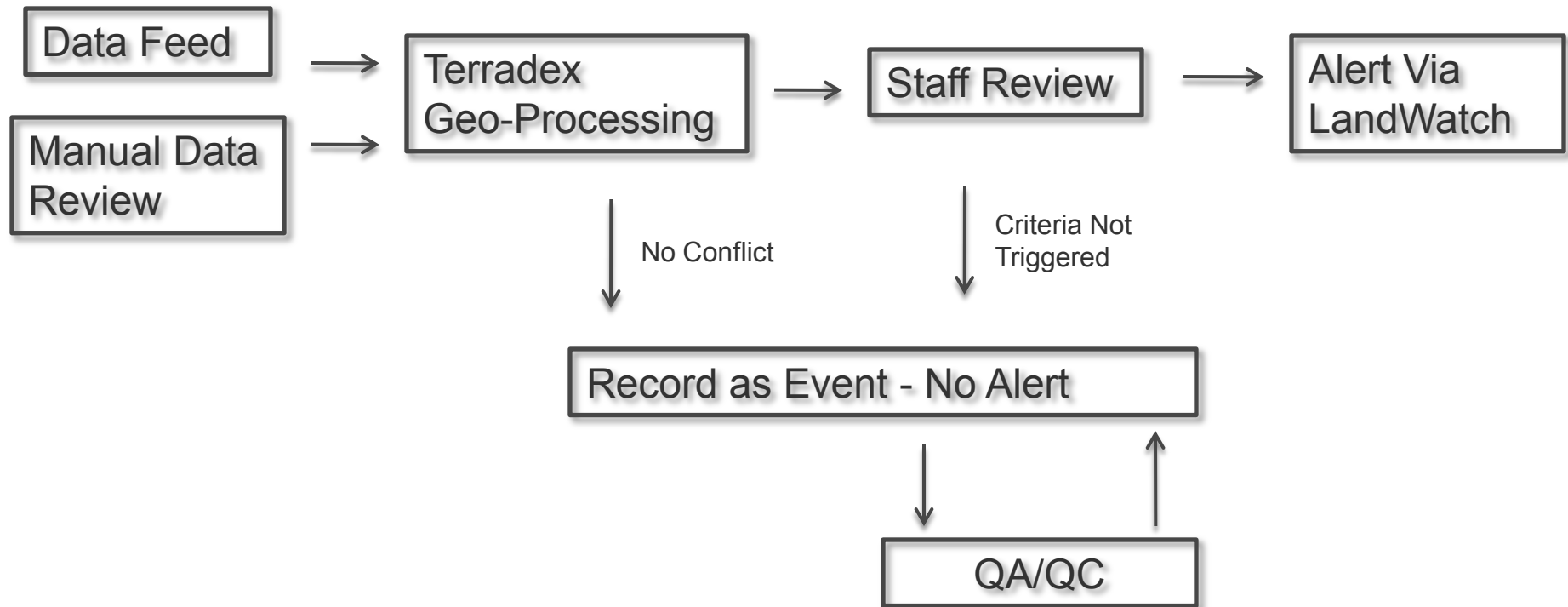
Other Sources

- Environmental Release Reporting
- Construction Request for Proposal



Electronic Monitoring Overview

3



WDI Land Activity Monitoring


4

Land Activity Monitoring/Sources	
Daily	
Excavation	USA South
For Sale/Foreclosure	Zillow, CoStar
Weekly	
Building Permits	Construction Monitor
Bi-Monthly	
Child Care Facilities	InfoUSA, CCCLD
Elder Care Facilities	InfoUSA, CCCLD
Monthly	
Major Construction Projects	McGraw Hill
Owner Change/Parcel Split	ParcelQuest

Sample LandWatch Alert


5

- Alerts are recorded as a web based form.
- Alerts are emailed and can be escalated based on event nature.
- Alerts record all internal notes until closure.
- All alerts are tracked to closure.

**TERRADEX LAND ACTIVITY ALERT**

Alert Number: 500437

Site Name and Address:
Former Service Station
2440 St. Charles Road
Bellewood
IL



[Click to view site details](#) Site ID: 3543

Event Details:
Excavation
INSTALL GAS MAIN - DIRECTIONAL BORING=YES.
DEPTH EXCEEDS 7 FEET=UNSURE

Work/Report (if in Planning) Date: 8/10/2009
Alert Begin: 08/05/2009
Alert Closure Date: 10/13/2009
Alert Follow Up Category:
Description of Alert Response:

Primary Contact Information for Event:
Name: GENE [REDACTED]
Company: HORTON PIPELINE
Phone: 815-495-0707
Fax: 815-759-6004
email: [REDACTED]

Secondary Contact Information: CITY OF [REDACTED]

Event Location Address, Description and Map:

[Message](#)

From: Client
Date: 08/06/2009

Please contact excavator and gather exact depth of excavation. If deeper than 5 feet, then provide advisory of petroleum hydrocarbons.

From: Terradex Staff
Date: 08/06/2009

Hello. We detected this planned excavation taking place within the zone of the Highway Authority Agreement. Please review this alert and let us know if you need further information, or proceed with closing the alert.

Please provide your response below:
Please indicate the appropriate closure category and/or not the action(s) you will/have taken in responding to this alert below.

☐ Alert reviewed, ongoing assessment and inquiry directed at closing the alert.
☐ Please check if with your response you are CLOSING the alert, AND select one Closure Category.
Please note: The alert will not close unless you select one Closure Category.

[Please click here to view Alert Closure Definitions](#)

Save Response

Appendix F
Institutional Control Technical Memorandum

Attachment 4
ICs Review Table

**Waste Disposal Inc. Superfund Site
Review of Institutional Controls (ICs)
Land/Water Use Restrictions**

Environmental Restriction Covenants - Prohibited Uses/Activities	Purpose	Approach	Basis/Information Source/Data Base	Lead	Frequency	Notes
Part I -- WDIG/Terradex™ Land Activity Monitoring						
Excavations	To detect potential new excavations onsite and within buffer area	Semi-automated data base searches	USA South (aka Dig-Alert)	Terradex	Two times daily	USA South sends email notifications of "events" to Terradex. Terradex staff send email notices to WDIG and screens for "alerts". WDIG follows up on alerts.
For Sale/Foreclosure	To detect potential changes in ownership/title	Web-based data base searches	Zillow™ (www.zillow.com) , CoStar™ (www.costar.com)	Terradex	Daily	Terradex staff review web sites for new listings, foreclosures & conduct analyses for WDI site parcels.
Building Permits	To detect potential new construction or building modifications onsite & within buffer area	Semi-automated data base searches	Construction Monitor™ (www.constructionmonitor.com)	Terradex	Weekly	Terradex reviews web sites for SFS and WDI site parcels to detect leads on new construction projects and permits
Zoning & Land Use	To detect potential changes in land use or zoning	Semi-automated data base searches	SFS web site	Terradex	Monthly	Terradex™ reviews the city of SFS web sites for zoning changes
Major Construction	To detect potential major construction	Semi-automated data base searches	McGraw Hill™	Terradex	Monthly	Terradex™ reviews the web site for leads on major construction projects
Ownership/Parcel Split	To detect change in ownership/title	Semi-automated data base searches	ParcelQuest (www.parcelquest.com)	Terradex	Monthly	Terradex reviews the site for ownership/title changes
Sensitive Use Review	to detect license for potential sensitive uses such as child/elder care facilities	Semi-automated data base searches	InfoUSA (www.infousa.com), California Community Care Licensing Division (CCCLD)			Terradex reviews sites for indications of new licenses for sensitive use facilities near the site.
County Records (File Review) - See Recommendations	To confirm that ERCs remain in place for each land parcel	File review of county records to confirm ERCs remain in place	County Records	Terradex; and/or WDIG	Annually	Recommended Action: (1) Coordinate with WDIG to confirm methodology & frequency; (2) Document in updated ICMEWP and OMM reports.
Preliminary Title Reports (PTRs) - See Recommendations	To verify ERCs remain in place; to detect or confirm potential additional encumbrances, such as easements or liens; to confirm title status	Obtain PTRs for all parcels (or a subset subject to EPA approval) to document title status and confirm ERCs remain in place.		WDIG	Every 5 years	Recommended Action: (1) Coordinate with WDIG to confirm methodology & frequency; (2) Document in updated ICMEWP and OMM reports.
Part II -- Monitoring of Prohibited Uses from Section 4.02 of ERCs (WDIG/ProNav/Terradex™)						
Placement of warning signs or other posted information shall be allowed and, once posted, no removal or interference with such signs or information shall be permitted.	To ensure retention of informational controls; to prevent exposure to waste materials	Site inspection	Parcel-specific checklist w/ detailed parcel maps	Project Navigator Ltd.	Quarterly	Physical site inspections are conducted by ProNav on behalf of WDIG.
Placement of site access controls, such as gates or fencing, shall be allowed and shall not be damaged or circumvented.	To control access; to provide security; to retain integrity of site systems; to prevent exposure to waste materials.	Site inspection	Parcel-specific checklist w/ detailed parcel maps	ProNav	Quarterly	ProNav conducts inspections and repairs gates and fencing as needed.
The property shall not be used in any manner that may interfere with or affect the integrity of the remedial cap or other components of the remedy as constructed pursuant to the Amended ROD.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Site inspection	Parcel-specific checklist w/ detailed parcel maps	ProNav	Quarterly	ProNav™ conducts inspections at least quarterly; Terradex™ monitors for advanced indications of potential changes in land uses.
Construction not approved by EPA that impacts any of the remedial capping of other remedy components shall not occur.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Site inspection; IC land activity monitoring	Parcel-specific checklist w/ detailed parcel maps; web-based monitoring for new construction	ProNav; Terradex	Quarterly	Quarterly inspections plus ongoing web-based monitoring by Terradex™
No interference or alterations to the grading, vegetation, and surface water and drainage controls shall be made.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Site inspection	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	
Portions of the property underlain by Waste Materials and in soil gas noncompliance areas shall not be regraded.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Site inspection	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	
Areas of asphalt or concrete pavement shall not be removed or improved.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Site inspection	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	

**Waste Disposal Inc. Superfund Site
Review of Institutional Controls (ICs)
Land/Water Use Restrictions**

Environmental Restriction Covenants - Prohibited Uses/Activities	Purpose	Approach	Basis/Information Source/Data Base	Lead	Frequency	Notes
No penetrations through or interferences (including , but not limited to, utility trench excavation, excavations for fence posts, excavations for planting trees, or large bushes, foundation excavations, and foundation piles) with the remedial cap or any areas with remedial controls shall be made.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Site inspection	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	
Deep-rooting plants (plants whose root systems will penetrate more than two feet below ground surface shall not be planted.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Site inspection	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	
Obtain approval from EPA for settings of irrigation controls in areas underlain by Waste materials. Such settings shall not be changed without prior written approval from EPA in accordance with Section 5.01 unless such settings are approved by EPA as part of the remedy selected in the amended ROD.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Site inspection	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	
Drainage controls shall not be blocked, rerouted, or otherwise interfered with	To ensure integrity of remedial systems; to prevent exposure to waste materials	Site inspection	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	
No new openings shall be made in building floor slabs in buildings located over Waste Materials or over soil gas non compliance areas.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Site inspection (indoor)	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	Note: frequency of in-business inspection may vary if tenants do not provide timely access
Integrity of existing and future foundations shall be maintained in areas underlain by Waste Materials and in soil gas non-compliance areas. All cracks or damage in such foundations shall be reported to the WDIG site trust and EPA and the Coventor covenants such that such cracks or damage shall be reported by the Owner or Occupant.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Site inspection (indoor)	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	Includes sub-slab monitoring systems. Note: frequency of in-business inspection may vary if tenants do not provide timely access
Indoor gas controls shall not be circumvented.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Site inspection (indoor)	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	Note: frequency of in-business inspection may vary if tenants do not provide timely access;
Indoor gas sensors or alarms shall not be turned off or interfered with.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Site inspection (indoor)	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	Note: frequency of in-business inspection may vary if tenants do not provide timely access;
Monitoring points , including but not limited to, groundwater monitoring wells, soil gas probes, reservoir leachate collection wells, soil gas vents, and survey monuments, shall not be blocked or otherwise obstructed.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Inspection	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	
Monitoring wells shall not be opened, northing shall be placed into he monitoring wells.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Inspection	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	
Liquids recovery systems , liquids t4retment systems, and treated liquids storage facilitates shall not be turned off or interfered with.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Inspection	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	
Groundwater supply or monitoring wells shall not be constructed	To ensure integrity of remedial systems; to prevent exposure to waste materials	Inspection	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	
Owners of the property shall disclose all land/water use restrictions to all Occupants f the property.	To ensure Occupants (e.g., tenants) are familiar with lcs and restricted uses.	Inspection	Parcel-specific checklists w/ detailed parcel maps	ProNav	Quarterly	Recommendation: WDI should explicitly address this in ICMEWP and/or parcel-specific checklist
Owners shall inform the WDI Site Trust and EPA of the identities of all Occupants of the property.	To ensure Occupants (e.g., tenants) are familiar with lcs and restricted uses.		Parcel-specific checklists w/ detailed parcel maps	(1) owners, (2) ProNav (backstop)		Recommendation: WDI should explicitly address this in ICMEWP and/or parcel-specific checklist

ATTACHMENT 4
Waste Disposal Inc. Superfund Site
Review of Institutional Controls (ICs)
Land/Water Use Restrictions

3/18/13

Environmental Restriction Covenants - Prohibited Uses/Activities	Purpose	Approach	Basis/Information Source/Data Base	Lead	Frequency	Notes
During construction , excavation, an grading, of any type on the property, Owner or Occupant shall take measures to ensure that there is no offsite migration of dust , odors, or organic vapors. During such activities, Owner or Occupant shall take appropriate measures to protect the health and welfare of onsite personnel and workers and to prevent offsite impacts.	To prevent exposure to waste materials	Inspections	Parcel-specific checklists w/ detailed parcel maps	ProNav™		Recommendation: WDIG/ProNav should update checklist & remind owners/tenants during inspections.
Owner of Occupant must obtain prior written approval for all building or site modifications on the property from EPA in accordance with Section 4.01 and Section 5.01.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Inspection	Parcel-specific checklists w/ detailed parcel maps	ProNav		Recommendation: WDIG/ProNav should update checklist & remind owners/tenants during inspections.
Owner or Occupant shall not excavate Waste Materials on the Site, except as authorized by EPA.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Site inspection; IC land activity monitoring	Parcel-specific checklists w/ detailed parcel maps	ProNav; Terradex™		
No new construction shall occur on the Property without the prior written approval of EPA in accordance with Section 5.01 and the following requirements (i) New construction shall be supported by subsurface explorations and analytical laboratory data to characterize the construction area for possible existence of Waste Materials; (ii) If Waste Materials are discovered in the construction area, they shall be remediated or building and structures must be appropriately designed to protect occupants; (iii) appropriate worker and public health and safety precautions , including but not limited to, dust control, safety plans, and other forms of worker protection, must be taken prior to approval of construction.)	To ensure integrity of remedial systems; to prevent exposure to waste materials	Inspections; IC land activity monitoring	Parcel-specific checklists w/ detailed parcel maps	ProNav; Terradex™		This is covered by both inspections and web-based IC monitoring by Terradex™.
Boreholes, foundation piles, or other subsurface penetrations into the reservoir or any other area of the site which could create conduits allowing Waste Materials to migrate to groundwater shall not be made.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Inspection	Parcel-specific checklists w/ detailed parcel maps	ProNav		
Construction workers shall be provided with appropriate personal protective equipment while they are working at the site.	To prevent exposure to waste materials	Oversight				Oversight to be conducted by WDIG & EPA (as appropriate)
Pesticides and herbicides shall not be applied to the capped areas of the site or to areas surrounding monitoring points, except as approved by EPA for use in implementing the remedy selected in the Amended ROD.	To prevent exposure to waste materials	Inspection	Parcel-specific checklists w/ detailed parcel maps			* How best to monitor for pesticide use by Occupants (tenants)in addition to periodic inspections?
Use of any septic tank on property shall be discontinued and such tanks shall be decommissioned in accordance with local regulations.	To ensure integrity of remedial systems; to prevent exposure to waste materials	Inspection	Parcel-specific checklists w/ detailed parcel maps			Inspect to verify no surface indications of septic tanks
The property shall not be used or redeveloped for residential use, use as a hospital, school for people aged 21 or under, or day care center, or other uses by sensitive receptors.	To prevent exposures to sensitive receptor populations	Sensitive Use Review	InfoUSA™; California Community Care Licensing Division (CCCLD)	Terradex	Weekly	Use IC web-based monitoring and confirm with quarterly inspections
Technical Oversight (USACE on behalf od EPA)						
	To conduct routine and follow-up site inspections as part of technical oversight fo USAPA	Inspections (vrying levels of detial)	Site overview inspections to detect "exceptions" (problems, issues, areas for improvement).	USACE	Approx monthly	USACE conducts site oversight inspections roughly every month, noting any pertinent issues requiring follow-up. USACE coordinates with ProNav to facilitate timely resolution of issues.

Appendix F
Institutional Control Technical Memorandum

Attachment 5
Figure 7-1 from OMM Report tracking Events and Alerts (Terradex)

FIGURE 7-1

General Plan Land Use



FIGURE 7-2

Summary Events Monitored

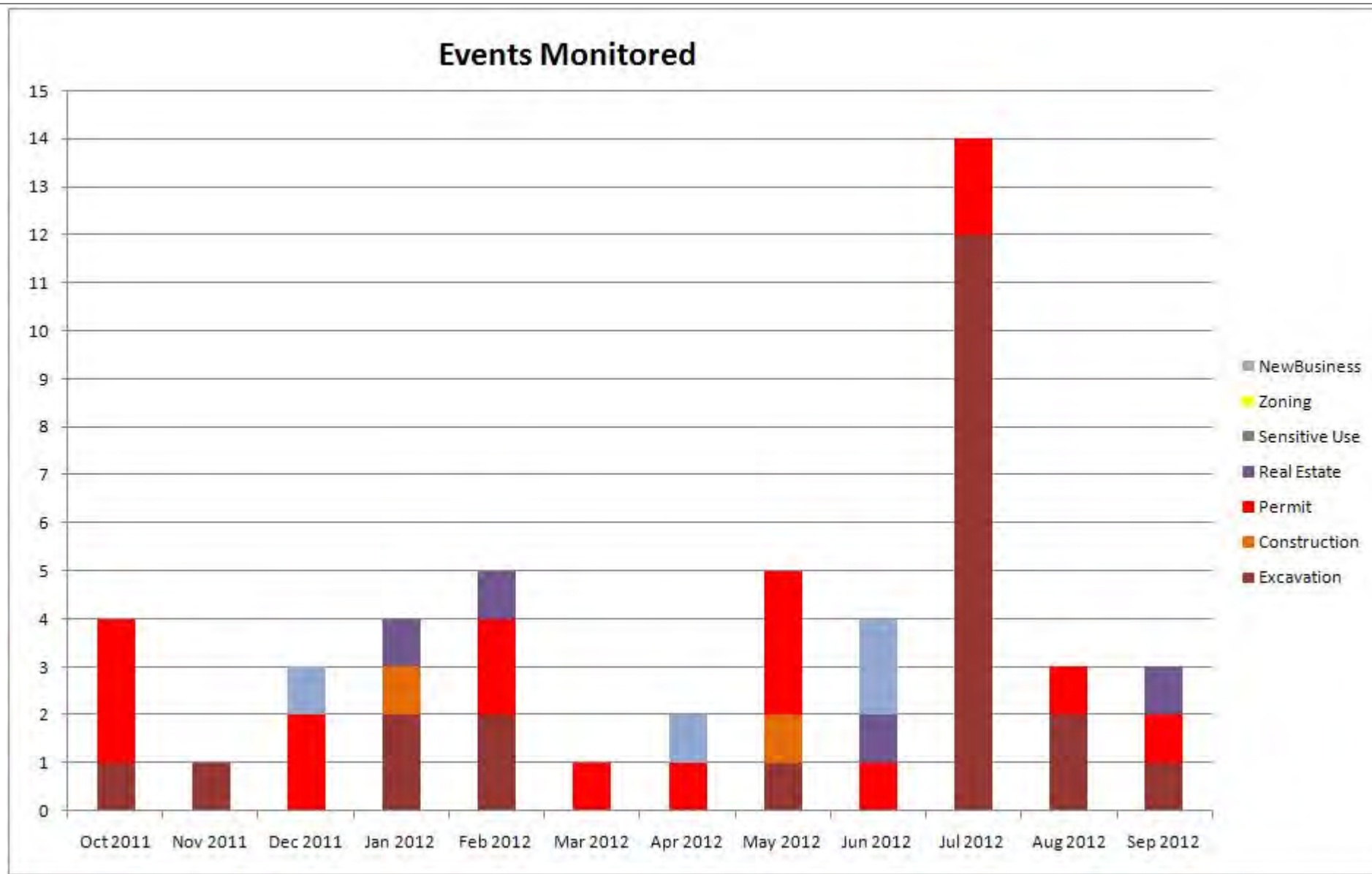
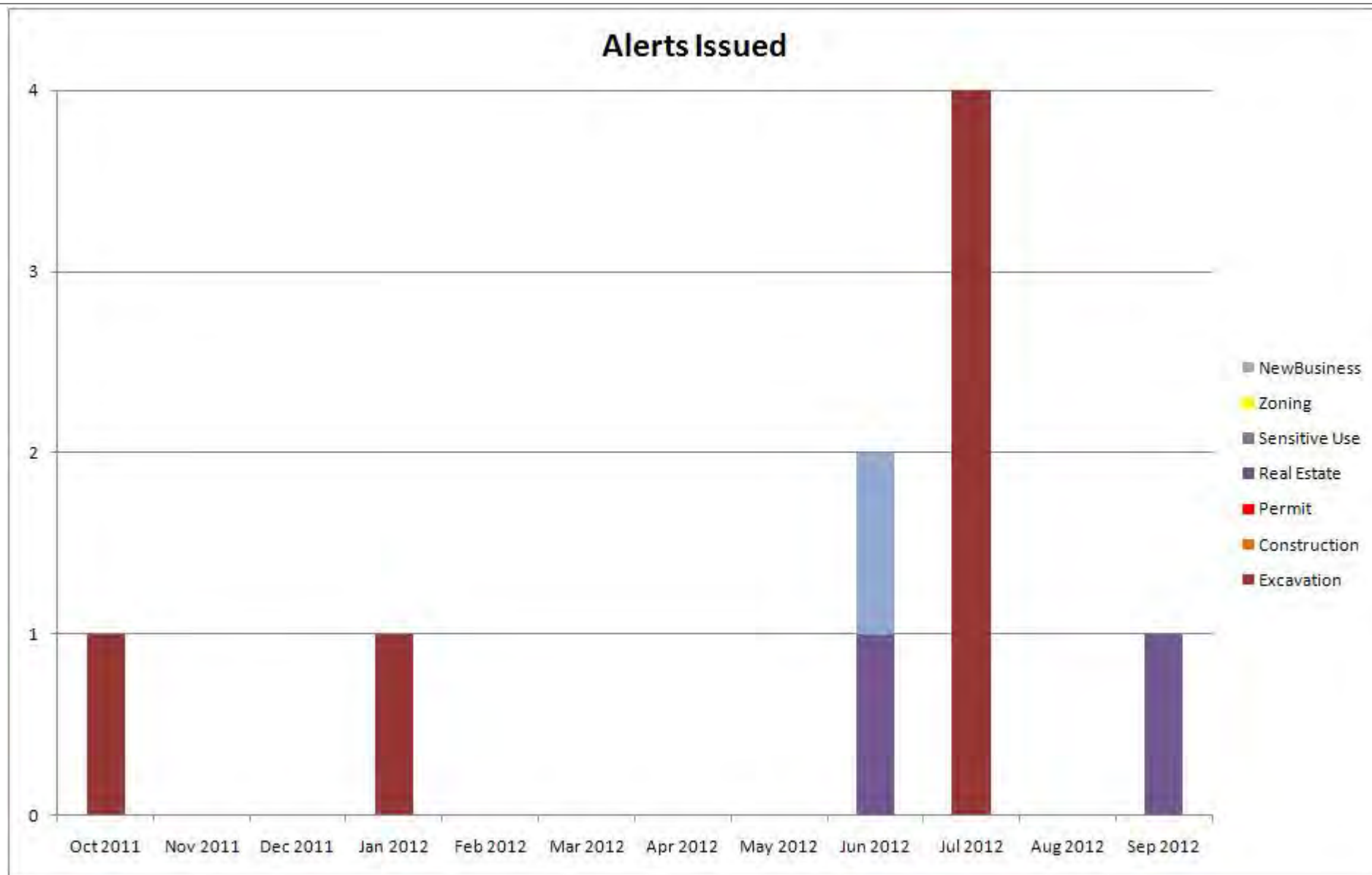


FIGURE 7-3

Summary Alerts Issued



Appendix F

Institutional Control Technical Memorandum

Attachment 6

Email from Mike Skinner, WDIG Project Coordinator, re. File Reviews

Mechem, Russell

From: Michael Skinner <mjs@superfundmanagement.com>
Sent: Wednesday, March 19, 2014 6:05 AM
To: Mechem, Russell
Subject: RE: WDI - ICs: Frequency of County Records Reviews

Yes, the ParcelQuest reviews - which identify property ownership transfers - are performed monthly. ParcelQuest updates the tax rolls weekly. We have not been reviewing the actual property records at the county recorder offices. The last time we did a physical search was in Dec. 2009 and I believe that was to confirm the issues with the Campbell property. The review of county records was an activity that we chose to do earlier because we did not have the capability to do it more frequently via computer. We used NETR and Parasec for support on the reviews of physical title.

Another item that needs updated in the work plan.

Thanks,
mjs

Michael J. Skinner Consulting, LLC
230 Kings Highway East, #300
Haddonfield, NJ 08033
Ofc: 856-429-5336
Email: mjs@superfundmanagement.com

www.superfundmanagement.com

From: Mechem, Russell [<mailto:Mechem.Russell@epa.gov>]
Sent: Monday, March 17, 2014 12:40 PM
To: Michael Skinner
Subject: WDI - ICs: Frequency of County Records Reviews

Mike:

As a follow-up question on ICs, we just wanted to confirm the frequency of physical title records reviews at the county. I think I was hearing that the county records are not reviewed physically on a regular basis, but are essentially reviewed as needed (e.g., as follow-up on an event). The ParcelQuest reviews are done monthly, however. Is that correct?

USEPA

F. RUSSELL MECHEM II

Project Manager
U.S. Environmental Protection Agency
Superfund Division (SFD-8-2)
75 Hawthorne Street
San Francisco, CA 94105
415.972.3192